

## Appendix C

## **E. Pollution Prevention / Good Housekeeping for Community Operations (MCM #6)**

### **1. The Permit requirement (per Ohio EPA NPDES Permit No.: OHQ100000)**

*3.2.6.1.1 Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from community operations; and*

*3.2.6.1.2 Using training materials that are available from Ohio EPA or other organizations, your program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.*

### **2. Pollution Prevention and Good Housekeeping Plan**

The BMPs, measurable goals, and responsible parties in this Pollution Prevention and Good Housekeeping Plan are detailed in Table 5. In addition to Table 5, per Ohio EPA NPDES permit requirement 3.2.6.2, we are documenting our decision process with the following information required by the permit.

*3.2.6.2.1 Your operation and maintenance program to prevent or reduce pollutant runoff from your community operations. Your program must specifically list the community operations that are impacted by this operation and maintenance program. You must also include a list of industrial facilities your community owns or operates that are subject to the Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to your MS4. Include the Ohio EPA permit number or a copy of the Industrial NOI for each facility.*

The CCEO has a Maintenance Department of approximately 77 employees. We are responsible for the maintenance of approximately 22 lane miles of the County Road system in Olmsted Township and Chagrin Falls Township. Additionally, we are responsible for the maintenance of approximately 220 bridges on the County Road system throughout the county. With the exception of the bridges, the CCEO is not responsible for the maintenance of the County Road system in the incorporated areas. While we are responsible for the maintenance of the bridges, we are not responsible for snow and ice removal on the bridges in incorporated areas. In order to accomplish our responsibilities, we operate a total of five (5) maintenance yards located throughout Cuyahoga County.

*3.2.6.2.2 Any government employee training program you will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. Describe any existing, available materials you plan to use. Describe how this training program will be coordinated with the outreach program developed for the Public Involvement and Education minimum measure and the illicit discharge minimum measure.*

Currently, the CCEO does not provide any training to its employees to prevent and reduce storm water pollution from its various activities. However, we are in the process of developing a program that will help educate 100% of our maintenance employees within three (3) years and will continue annual training for said employees. This program, along with the Illicit Discharge Minimum Control Measure will be coordinated along with our Public Information Department. Our training program will utilize information gathered by the Public Information Department and the Chief Maintenance Superintendent regarding Pollution Prevention/Good Housekeeping for Municipal Operations. Included in this practice is the use of brochures, flyers, newsletters, and web sites. We are not aware of materials and programs that may be available to us. These information pieces are made available by Therefore, our earliest efforts will be ~~investigating the sources of materials and programs available from outside agencies such as the Ohio EPA, the Cuyahoga County Soil and Water Conservation District, The Cuyahoga County Board of Health and others. Our ultimate goal will be to provide training for 100% of our maintenance employees within three (3) years and develop a program of continuing training for all employees beyond that time. As procedures are developed concerning the documentation of Illicit Discharge complaints and the follow-up investigation, all of our employees will be trained in those procedures.~~ In addition, along with the Illicit Discharge Minimum Control Measure, we will also teach our employees how to properly document the tracking and elimination procedures of any and all waste. These forms of documentation will be reviewed at annual training sessions and will be updated annually.

Employees will be trained in the educational materials that the CCEO has available for the public. In the event that they become aware of activities by the public detrimental to the storm water system, they will notify our Public Information Office so that proper educational materials can be provided to that specific target area.

*3.2.6.2.3 Your program description must specifically address the following areas:*

*3.2.6.2.3.1 Maintenance activities, schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants in your MS4.*

The CCEO currently disposes of construction debris in proper landfills. The CCEO will maintain records of such disposals.

The CCEO will review various sources to determine the maintenance schedules required for proper catch basin and ditch cleaning, street sweeping and debris removal, develop and implement the appropriate policy and assure that all employees are trained.

The CCEO will review various sources to determine the proper storage and optimum application schedule for road salt, develop and implement the appropriate policy and assure that all employees are trained.

*3.2.6.2.3.2 Controls for reducing or eliminating the discharge of pollutants from streets, community parking lots, maintenance and storage yards, waste transfer stations, fleet maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas you operate.*

The CCEO currently disposes of construction debris in proper landfills. The CCEO will maintain records of such disposals.

The CCEO will review various sources to determine the proper method of debris storage and removal from catch basin and ditch cleaning and street sweeping. The CCEO will develop and implement the appropriate policy and assure that all employees are trained.

The CCEO will review all maintenance yards to assure that all stored products are protected from spillage, insure that all waste products are disposed of properly and all spills contained. The CCEO will develop and implement the appropriate policy and assure that all employees are trained.

*3.2.6.2.3.3 Procedures for the proper disposal of waste removed from your MS4 and your community operations, including dredge spoil, accumulated sediments, floatables, and other debris.*

The CCEO will review various sources to determine the proper method of debris storage and disposal from catch basin and ditch cleaning, street sweeping and other maintenance activities. The CCEO will develop and implement the appropriate policy and assure that all employees are trained.

*3.2.6.2.3.4 Procedures to ensure that new community flood management projects are assessed for impacts on water quality and that existing projects are assessed for incorporation of additional water quality protection devices and practices.*

This item is not directly applicable to our activities.

*3.2.6.2.4 Who is responsible for overall management and implementation of your pollution prevention/good housekeeping program and, if different, who is responsible for each BMP identified in this program.*

The CCEO Chief Maintenance Superintendent will be responsible for overall management and implementation of our pollution prevention/good housekeeping program. Responsibility for individual BMPs will be noted in Table 5.

*3.2.6.2.5 How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.*

The success of this MCM will be determined by our ability to meet or exceed the measurable goals of each and every BMP as listed in Table 5. The measurable goals for each BMP were individually selected based upon the current practices of the CCEO as well as advancements that we feel can be practically achieved.

<b>TABLE 5 – Pollution Prevention/Good Housekeeping Best Management Practices Summary</b>			
<b>Best Management Practice</b>	<b>Permit Requirement Fulfilled</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>
Chemical lawn care use	3.2.6.1.1 3.2.6.1.2 3.2.6.2.2	Chief Maintenance Superintendent	By Dec. 31, 2003 Develop policy to minimize the use of herbicides, fertilizers, and insecticides by community personnel to no more than the recommended levels.  Provide training to employees concerning proper herbicide use by Dec. 31, 2004.
Disposal of Construction Debris from Community projects	3.2.6.1.1 3.2.6.3.3.1 3.2.6.3.3.2 3.2.6.3.3.3	Chief Maintenance Superintendent	Verify that all construction debris is disposed in a proper manner.
Catch Basin Cleaning	3.2.6.1.1 3.2.6.1.2 3.2.6.2.2 3.2.6.2.3.1 3.2.6.2.3.2 3.2.6.2.3.3	Chief Maintenance Superintendent	Review available sources to determine proper interval for catch basin cleaning by Dec. 31, 2003. Determine location of all catch basins in our jurisdiction from the storm sewer map, and develop a policy for regular cleaning by Dec. 31, 2004. Follow policy for regular catch basin cleaning starting by Dec. 31, 2005. Verify that all catch basin debris is disposed in a proper manner, at a special waste landfill
Fleet Maintenance	3.2.6.1.1 3.2.6.1.2 3.2.6.2.2 3.2.6.2.3.1 3.2.6.2.3.2	Chief Maintenance Superintendent	Inventory all maintenance locations. Determine if stored products are protected from spillage. Insure that all waste products are properly disposed or recycled. All spills shall be contained and collected. Develop policy and training program by Dec. 31, 2004.
Outdoor Storage	3.2.6.1.1 3.2.6.1.2 3.2.6.2.3.1 3.2.6.2.3.2	Chief Maintenance Superintendent	<ul style="list-style-type: none"> <li>• Develop an existing drainage plan of each outdoor storage facility (Maintenance Yard) by Dec. 31, 2003.</li> <li>• Review Drainage plan to determine if deficiencies exist in storm runoff. Proper storage of salt and other materials will be included in this plan by Dec. 31, 2004.</li> <li>• Develop a plan to correct storm water collection deficiencies at all outdoor storage facilities by Dec. 31, 2005.</li> <li>• Begin implementing plan to correct deficiencies at all outdoor storage facilities by Dec. 31, 2006.</li> <li>• Complete implementation of plan to correct deficiencies at all outdoor storage facilities by Dec. 31, 2007.</li> </ul>
Salt Storage	3.2.6.1.1 3.2.6.1.2 3.2.6.2.3.1 3.2.6.2.3.2	Chief Maintenance Superintendent	Assure that salt storage complies with outdoor storage plan developed above by Dec. 31, 2007. Inspect annually.
Snow removal & Street Salting	3.2.6.1.1 3.2.6.1.2 3.2.6.2.3.1 3.2.6.2.3.2	Chief Maintenance Superintendent	Verify that the existing program for snow removal is followed to minimize salt discharge to the environment.
Ditch Cleaning	3.2.6.1.1 3.2.6.1.2 3.2.6.2.2 3.2.6.2.3.1 3.2.6.2.3.2	Chief Maintenance Superintendent	The CCE currently cleans roadside ditches in township jurisdiction when weather permits (normally April until inclement weather prevents us from doing so). CCE will review this policy to determine proper intervals and procedures by Dec. 31, 2003

<b>TABLE 5 – Pollution Prevention/Good Housekeeping Best Management Practices Summary</b>			
<b>Best Management Practice</b>	<b>Permit Requirement Fulfilled</b>	<b>Responsible Party</b>	<b>Measurable Goal</b>
	3.2.6.2.3.3		Train employees concerning policy by Dec. 31, 2004  Follow policy for regular ditch cleaning: 2005 – 2007 Verify that all ditch debris is disposed in a proper manner, at a special waste landfill annually through 2007
Street Sweeping	3.2.6.2.3.2	Chief Maintenance Superintendent	Review available sources to determine proper interval for street sweeping by Dec. 31, 2003. Develop Street Sweeping policy by Dec. 31, 2004. Follow policy for regular street sweeping starting by Dec. 31, 2005.
Employee Education	3.2.6.2.2	Chief Maintenance Superintendent	Along with the Public Information Department, will gather all information, in the form of brochures, flyers, newsletter, etc., on Pollution Prevention/Good Housekeeping, and present to CCEO maintenance employees annually. Information will include proper herbicide use, disposal of construction debris, how to properly clean catch basins, treatment of fleet maintenance, drainage of outdoor storage, proper storage of salt, snow removal and street salting, proper cleaning of ditches and street sweeping. Meeting will be held with the entire Maintenance staff by the end of 2004 and will be repeated annually.