



State of Ohio Environmental Protection Agency

Southeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 28, 2008

Re: Belmont County
Phase II/MS4
Belmont County and Others
Permit Number 0GQ00008*AG
MS4 Program Audit Findings

Belmont County Commissioners
101 West Main Street
St. Clairsville, Ohio 43950

Dear Commissioners:

On February 4, 5, and 6, 2008, Ohio EPA conducted an audit of Belmont County and Others Municipal Separate Storm Sewer System program. The audit was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. As a result of the audit, I have the following comments regarding your permit requirements:

3.2.1 Public Education and Outreach

1. Develop a flow chart showing all of the steps in obtaining a storm water permit.
2. Create an organizational chart listing the contact information for each department.
3. Pursue obtaining free information for distribution from the litter prevention office of the Ohio EPA.
4. Pursue grants for funds to purchase supplies.
5. Include more information about illicit and industrial discharges in your outreach.
6. Your public education and outreach program was one of the best I have seen.

3.2.2 Public Involvement and Participation

1. Keep trying to involve the public as much as possible. This seems to be a task that is difficult to accomplish in some rural areas.

3.2.3 Illicit Discharge Detection and Elimination

1. Ohio EPA recommends that operators within the MS4 pursue sewerage any areas that have failing or discharging onsite sewage treatment systems.

2. Inspections on all home sewage treatment systems should be completed annually. Please document the address and owner of each system along with whether or not the system is failing or discharging. Work with the county Health Department to ensure this action is completed within the MS4.
3. It appears that the ordinance wording dealing with illicit discharges is not as focused as it should be. Evaluate this ordinance again and implement wording that will meet the intent of the MS4 program. You must have the authority to correct illicit discharge issues. You can find information on illicit discharges at the following link:
http://www.epa.state.oh.us/dsw/storm/ms4_index.html
4. Inventory all industrial facilities as outlined by the federal fact sheet that was sent to Chad Turner. The intent of this action is to map these sources not make contact at this point.
5. Dry weather screening is required for 100% of the outfalls over the five year permit term. Please submit your schedule for the next five year permit cycle.
6. Coordinate with your cities to determine how much smoke testing is being completed and what types of problems are being found.

3.2.4 Construction Site Storm Water Runoff Control

3.2.5 Post Construction Storm Water Management in New Development and Redevelopment

1. To ensure that your ordinance can remain seamless through permit changes I would recommend adding wording that brings the most current OEPA general construction stormwater permit into the ordinance as an appendix along with one statement stating something to the effect of "All operators must comply with the requirements set forth in the most current Ohio EPA general construction stormwater permit."

3.2.6 Pollution Prevention and Good Housekeeping for Municipal Operations

1. The Saint Clairsville Street Department and Electrical Department shop must keep sufficient used oil containers on hand to allow for the proper storage of oil.
2. The Shadyside Street Department operation was not organized well and oil was running into the floor drains inside the building. Please ensure that all inside floor drains are plumbed into the sanitary sewer and that a better fluids management plan is implemented immediately.
3. An Operations and Maintenance Plan should be developed to serve the needs of each specific municipal operation that is within the MS4 area. Submit this plan to me when complete. Please submit your schedule of anticipated completion.

4. Include information about the proper use of pesticides, herbicides, and fertilizers, in your training program.
5. Develop a method to track catch basin cleaning, street sweeping, and how this material is disposed of.
6. Inspect and train employees at each municipal operation that is within the MS4 area.
7. Develop a list of all of the municipal operation's within the MS4 area.

Continue to work with Vaughn, Coast, and Vaughn and various other government entities to determine the boundaries of the MS4 areas.

It came to my attention that the current stormwater management plan does not reflect the needs of your county. Please review your stormwater management plan along with your ordinances and submit any changes to me. We can work together to formulate a plan that will work for both parties.

As a whole, your program lacks some written documents that would make the program complete. I urge you to review all of your written documents and add new documents to meet the requirements of the permit.

I would like to thank the commissioners for taking on such a large role in helping to pay for this program's implementation throughout the county.

Within sixty (60) days of receipt of this letter, please submit to me at this office a written notification as to actions taken or proposed to address the above comments. Your response should include the dates, either actual or proposed, for the completion of the actions. If you have any questions, please contact me at (740) 380-5277.

Sincerely,



Aaron Wolfe
Storm Water Coordinator
Division of Surface Water

AW/mlm

cc: Chad Turner
cc: Mayor Bob Neuhart, Shadyside
cc: Don Crucotti, Shadyside
cc: Mayor Phil Wallace, Martins Ferry
cc: John Davies, Martins Ferry
cc: Mayor Vince DiFabrizo, Bellaire
cc: Street Superintendent, Bellaire
cc: Mayor, City of Bridgeport
cc: Mayor Robert Vincezo, St. Clairsville
cc: Service Director, St. Clairsville