



State of Ohio Environmental Protection Agency

Southeast District Office

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www.epa.state.oh.us

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

March 28, 2008

Re: Washington County
Phase II/MS4
City of Marietta
Permit Number 0GQ00001*AG
MS4 Program Audit Findings

Mr. Joe Tucker
City of Marietta Engineering Department
304 Putnam Street
Marietta, Ohio 45750

Dear Mr. Tucker:

On January 7, 8, and 9, 2008, Ohio EPA conducted an audit of the City of Marietta 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. Pursue additional funding for educational supplies.
2. Conduct contractors' workshop on an annual basis.
3. Website development is a very economical way to inform the public about MS4 issues. Continue implementation of your website development and submit a schedule for completion.
4. Create an organizational chart listing the contact information for each department.
5. Utilize the local colleges for interns during the summer months. Many programs require an internship to be completed.

3.2.2 Public Involvement and Participation

1. Form a storm water task group that includes citizen members and hold regular meetings.

3.2.3 Illicit Discharge Detection and Elimination

1. Submit a map of the MS4 system when it is complete.
2. Ohio EPA recommends that the City of Marietta pursue sewerage any areas that have failing or discharging onsite sewage treatment systems.
3. 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.
4. Ohio EPA recommends sampling during dry weather to determine if illicit discharges are occurring.
5. Coordinate with the fire department and other responder groups to determine how spills are handled in the city.
6. GPS all points that are outlined on the stormwater map.
7. GPS post construction BMP's and show them on the stormwater map.
8. 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
9. Inventory all industrial facilities as outlined by the federal fact sheet that was faxed to Kathy Davis. The intent of this action is to map these sources, not make contact at this point.
10. 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.
11. Ensure that all vehicle washing areas drain to sanitary sewers.

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."

2. Inspection forms should be developed and utilized during any construction site inspection. Our inspection form can be found at http://www.epa.state.oh.us/dsw/storm/CGP_Ins1.pdf
3. Ordinance requirements that were approved years ago do not match current requirements. My main concern is the post construction requirement. Please review the draft General Construction Stormwater Permit at: http://www.epa.state.oh.us/dsw/permits/Construction_Draft_GP_dec07.html for ideas on what will be required during the next five year permit cycle. I recommend passing the ordinance wording mentioned in #1 above soon, then work on reviewing the existing ordinance for changes that need to be implemented to meet requirements for the next five year permit cycle.

3.2.6 Pollution Prevention and Good Housekeeping for Municipal Operations

1. Develop a method to track catch basin cleaning routines.
2. Please paint the inside of the oil tank secondary containment dike, at the city maintenance garage, with some type of epoxy paint to ensure a spill would not seep through the block.
3. Place a cover on the refuse rolloff box, at the city maintenance garage, if stormwater that comes in contact with the refuse could contribute to a water quality standard violation
4. Track how many tons of street sweepings are sent to the landfill.
5. The drains around the lime sludge pile at the water plant must be tied into the sanitary sewer drain or the pile must be covered.

Please update your proposed revisions in the storm water management plan.

Phase II/MS4

Page 4

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,

A handwritten signature in black ink, appearing to read 'Aaron Wolfe', with a long horizontal flourish extending to the right.

Aaron Wolfe
Storm Water Coordinator
Division of Surface Water

AW/mlm

c: Kathy Davis