



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Re: Erie County  
ODOT  
MS4  
Storm Water

July 27, 2011

Mr. Hans Gucker, Storm Water Program Manager  
Ohio Department of Transportation  
1980 Broad Street  
Columbus, Ohio 43223

Dear Mr. Gucker:

On June 24, 2011, I received an inquiry regarding the disposal of street sweepings by ODOT at the interchange of State Route 2 and State Route 250 in Erie County. ODOT currently has coverage under the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges from the Municipal Separate Storm Sewer System (Small MS4 General Permit), Facility ID No. 4GQ0000\*BG. Under the Small MS4 General Permit, ODOT must develop and implement a Storm Water Management Program (SWMP) to control the discharge of pollutants to waters of the state from their municipal operations.

On June 24, 2011, I left a message with you notifying you of an issue in Erie County. Upon investigation and after speaking with ODOT District 3 staff, you informed me that ODOT District 3 sweeps a small stretch of State Route 2 once a year. They rent a sweeper. Due to the small amounts that are collected on each pass, they will stage the material (less than a dump truck) onsite for a week or two, then move it to a landfill. On June 28, 2011, you stated the material would be removed in the next day or so. I understand that you have also spoken with Sue Hardy, Ohio EPA Division of Materials and Waste Management, about the handling of street sweepings. On July 14, 2011, I inspected the area. It appeared that all material has been removed.

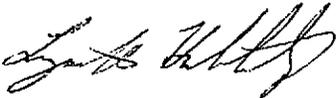
Catch basin cleanings and street sweepings are solid waste and must be stored and disposed of accordingly. Precipitation and runoff that comes into contact with this material and is discharged is considered leachate. ODOT is not authorized to discharge leachate from catch basin cleanings or street sweepings. Systems and procedures must be put in place to prevent the discharge of leachate to the MS4 or directly to waters of the state. *Failure to provide controls for reducing or eliminating the discharge of pollutants from storage areas is a violation of Part III.B.6.d.iii.2 of the Small MS4 NPDES Permit #OHQ000002.*

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Possible Best Management Practices include: using a dewatering pad connected to the sanitary sewer, using a drying pad at a wastewater treatment plant which discharges to a sanitary sewer, placing the dewatered material in covered roll-offs or watertight containers.

Within 10 days of the date on this letter, please submit to this office a **written response** to the above comments. Your reply should describe the actions taken or proposed to prevent any future violations, including dates for the completion of the actions. If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette Hablitzel, P.E.  
Division of Surface Water  
Storm Water Program

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pc: ~~DSW:NWDO:File~~

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Sue Hardy, DMWM-NWDO