



3GQ0000820100712

CUYAHOGA GARFIELD HEIGHTS CITY OF GARFIELD HEIGHTS 3GQ00008 2010/07/12 BOGOEVSKI,
DANIEL

This document has been removed. imaged and is now stored electronically.

From: "David G. Krock" <dgkrock@krockesser.com>
To: Dan Bogoevski <dan.bogoevski@epa.state.oh.us>
CC: Jason Fyffe <Jason.Fyffe@epa.state.oh.us>
Date: 7/12/2010 1:56 PM
Subject: RE: Garfield Heights Annual Report

Dan,

In regards to your email:

Item #1: I will review these locations and determine a course of action for each. As you might expect, I am dealing with a number of unresolved issues since taking over as City Engineer. I will have to follow-up with you on these.

Item #2: This is an oversight on my part. I represent a community in Summit County and simply used the organization chart that I had in place there - they certainly should indicate Cuyahoga County. The City of Garfield Heights does have MOU's with Cuyahoga SWCD, Cuyahoga County Board of Health, Cuyahoga County Sanitary Engineer, and NEORS. I will review the entire organization chart and make the appropriate revisions.

I'll provide the information, as requested.

Dave

David G. Krock, PE / City Engineer
City of Garfield Heights / 5407 Turney Road / Garfield Heights, OH 44125
216.475.1504 / 330.350.0521 mobile / dgkrock@krockesser.com

-----Original Message-----

From: Dan Bogoevski [mailto:dan.bogoevski@epa.state.oh.us]
Sent: Monday, July 12, 2010 1:25 PM
To: David G. Krock
Cc: Jason Fyffe
Subject: Garfield Heights Annual Report

David,

Thank you for submitting the City of Garfield Heights' annual report for 2009. In my quick review of the document, I noted two items that need further attention:

1. Illicit Discharge Detection & Elimination Program - Screening by CCBH identified 19 dry-weather flows. The City is obligated to identify the sources of those flows and determine if they are illicit (see Part III.B.3.g of the MS4 permit to determine what would not be considered illicit). CCBH does not make this determination in their reports. This is really something that the City must follow-up on. Further, if any of those 19 dry-weather flows are due to an illicit source, the City must eliminate them. For sources that may take time to eliminate, e.g., failing septic systems, Ohio EPA expects the City to provide us with a plan with proposed timeframes to complete each step of the process, e.g., City will sewer the street and submit PTI to Ohio EPA for sewer extension by X date. So, for the 19 dry-weather flows identified in your Annual Report, please determine if the discharges are illicit and provide me with a plan to eliminate those that are. This should be provided as an attachment to the Annual Report each year.

2. Table of Organization - Your table does not show the relationship between the administration and implementation of the six minimum control measures. Further, it references Summit County offices that would not be applicable to Garfield Heights, which is located in Cuyahoga County. Be aware that you must have a signed Memorandum of Understanding (MOU) or some other written agreement when you depend on another entity to perform BMPs on the City's behalf. Be sure that an agreement exists before listing another entity in your table.

Please provide me a response by July 30, 2010, so that I know how you intend to address these deficiencies in your MS4 program. These will show up as violations during an audit of the City's MS4 program if they are not corrected.

Sincerely,

Dan Bogoevski
Division of Surface Water
Ohio EPA Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087
(330) 963-1145

Ohio Environmental Protection Agency
Unless otherwise provided by law,