



3GQ0003320100928

CUYAHOGA STRONSGVILLE CITY OF STRONSGVILLE 3GQ00033 2010/09/28 BOGOEVSKI,
DANIEL

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**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

September 28, 2010

RE: CUYAHOGA COUNTY
ROCKY RIVER WATERSHED
CITY OF STRONGSVILLE
MUNICIPAL STORM WATER PROGRAM
3GQ00033*BG

Mr. Ken Mikula, City Engineer
City of Strongsville
16099 Foltz Parkway
Strongsville, OH 44149-5598

Dear Mr. Mikula:

On September 3, 2010, Ohio EPA received your response to our municipal separate storm sewer system (MS4) inspection report dated August 6, 2010. Although your response to most items provided an adequate plan and timeframe by which to implement said plan, a few of your responses do not adequately address the violations and deficiencies noted in our report. In particular, the following responses are inadequate:

- **Failure to control the discharge of leachate associated with yard waste and leaf collection operations.** Although the City contracts with Republic Services of Ohio LLC to provide this service and they operate under their own NPDES permit for storm water discharges associated with industrial activity, please be aware that the City of Strongsville still has obligations under the NPDES permit for storm water discharges from the MS4. At the very least, the following actions must be taken by the City in order to comply with the MS4 permit:
 - **Notify Republic Services of Ohio LLC that they are causing an illicit discharge to your MS4 and order them to eliminate it under the provisions of your local illicit discharge ordinance.** Neither the industrial storm water permit that Republic operates under nor the MS4 permit the City operates under authorizes the discharge of wastewater from yard waste and leaf collection operations. If the Storm Water Pollution Prevention Plan (SWP3) that Republic Services has developed for these operations states that leachate may be discharged into storm sewers, it is deficient and must be amended. I will schedule a compliance inspection with Republic Services, however in the meantime, the City is obligated to put them on notice that they cannot discharge leachate to the MS4. A copy of this notice should be sent to my attention at our Northeast District Office.
 - **Review the contract with Republic Services of Ohio LLC and add language requiring the implementation of storm water best management practices (BMPs) if it does not currently include it.** The MS4 permit obligates the City of Strongsville to include such language in any contract with third parties that provide municipal services on a contract basis. The contract with Republic Services of Ohio LLC is a contract subject to this requirement. Your response indicated that the City will develop contract language for future use and will include a copy with your next annual report. Please be sure that this language is added to your contract with Republic Services of Ohio, or other party with which you may contract in the future, once the current contract term expires. Please identify the date that the current contract with Republic Services expires.

MR. KEN MIKULA, CITY ENGINEER
SEPTEMBER 28, 2010
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- **Employee training on pollution prevention for municipal operations to prevent illicit discharges from painting operations.** The response indicates that the operator that uses this material and his staff have been given specific instructions on how to handle wash out material in the future, but the procedure to be adopted was not specified in your response. Please clarify the procedure that will be followed to prevent such discharges in the future. Please be sure that this topic is included in employee training provided to Service Department staff.

Please provide me with the requested information no later than October 12, 2010. If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB:bo

pc: Joseph Walker, Service Director, City of Strongsville