



3GQ0000220110105

TRUMBULL CORTLAND

TRUMBULL COUNTY
COMMISSIONERS & OTHERS

3GQ00002 2011/01/05

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**Environmental
Protection Agency**

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

April 1, 2011

RE: TRUMBULL COUNTY
CITY OF CORTLAND
NPDES PERMIT NO. OHQ000002
OHIO EPA PERMIT NO. 3GQ00002*BG
MUNICIPAL STORM WATER
INSPECTION REPORT – MCM #6

Mr. Don Wittman
Director of Public Service
City of Cortland
400 North High Street
Cortland, OH 44410

Dear Mr. Wittman:

On December 14, 2010, Ohio EPA performed an audit for a portion of your municipal storm water program to determine compliance with Ohio EPA General Storm Water National Pollutant Discharge Elimination System Permit for Small Municipal Separate Storm Sewers Systems (MS4) (General Storm Water Permit) 3GQ00002*BG and Ohio Administrative Code 3745-39. Via a notice of violation (NOV) dated January 4, 2011, Ohio EPA notified you of the audit findings, which included violations and deficiencies associated with the General Storm Water Permit and the implementation of the City of Cortland's storm water management program.

On February 4, 2011, Ohio EPA received the City of Cortland's response to the audit findings (audit response). Unfortunately, the audit response appears to only address the summarized audit findings and failed to include a schedule of compliance for many of the violations and deficiencies. As an example, Ohio EPA documented that the City of Cortland had not developed a plan to detect and address illicit discharges to the MS4. The audit response stated "the city recognizes the need to detail its program in writing and provide documentation of the monitoring activities." A compliance schedule must be included detailing when the plan is to be completed and implemented.

In order to provide clarification for violation No. 8 of the audit, after reviewing the information provided by the City of Cortland, Ohio EPA concurs with the rationale that post-construction storm water management best management practices were not required to be installed on the Main Street improvement project.

The City of Cortland must submit to Ohio EPA a schedule of compliance for all items detailed within the "notes" sections of the January 4, 2011 "Municipal Storm Water Program Evaluation" worksheet and not just the summary of audit findings. At a

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minimum, a month and year must be provided that details when each corrective action will be developed and implemented. The schedule of compliance that addresses the January 4, 2011 "Municipal Storm Water Program Evaluation" worksheet must be submitted to Ohio EPA by April 29, 2011. Should you have any questions regarding this matter, please contact me at (330) 963-1118 or via e-mail at chris.moody@epa.ohio.gov at your convenience.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt

cc: Curt Moll, Mayor, City of Cortland
Mike Wilson, Trumbull County Soil and Water Conservation District