



\*3GQ0011820090108\*

SUMMIT

MACEDONIA

CITY OF MACEDONIA

3GQ00118 2009/01/08 ROGERS, KELVIN

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State of Ohio Environmental Protection Agency

**Northeast District Office**

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

January 8, 2009

RE: SUMMIT COUNTY  
CUYAHOGA RIVER BASIN  
CITY OF MACEDONIA  
MS4 PROGRAM AUDIT

Mr. Rob Jamieson  
Public Service Department  
City of Macedonia  
9691 Valley View Road  
Macedonia, Ohio 44056

Dear Mr. Jamieson:

Ohio EPA has completed an audit of the City of Streetsboro Municipal Storm Water Program. This program is a requirement of the Ohio EPA General Storm Water NPDES Permit for Small Municipal Separate Storm Sewers Systems (MS4s) #3GQ00118\*AG and Ohio Administrative Code 3745-39. On December 9, 2008, Ohio EPA met with you and other representatives of the City of Macedonia to determine compliance with the NPDES permit and the Storm Water Management Plan (SWMP) submitted by Macedonia in March 2003.

Storm water best management practices (BMPs) were evaluated to determine if they are being implemented per the expectations of Ohio EPA. In performing this audit, Ohio EPA utilized the Municipal Storm Water Program Evaluation Guide developed by the United States Environmental Protection Agency.

The original SWMP submitted by Macedonia was deficient in several areas and was noted in our review letters dated March 12, 2004 and July 16, 2007. Additionally, the City of Macedonia was deficient in submitting their Annual Reports in a timely manner as required by the permit. On November 11, 2008 a Notice of Violation regarding these and other deficiencies was sent to Macedonia by our Central Office.

In response to these deficiencies the City has submitted their 2007 Annual Report, dated December 15, 2008, which details its efforts to come into compliance with the permit requirements. The former City Engineer in charge of the storm water program retired in early 2008 and an engineering firm (GPD Group) has been contracted to assist the City in implementing the program.

The City is now following the SWMP that was originally prepared for Summit County and its Co-Permittees under permit number 3GQ00065\*AG. Once the renewal MS4 permit becomes finalized in 2009, Macedonia expects to join the Summit County communities under coverage of a single permit.

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Please review the following items in detail for recommendations on specific elements where your program needs improvement under the following Minimum Control Measures (MCMs) outlined in the SWMP:

#### Public Involvement and Public Education

- It was noted that Macedonia in 2007 initiated a public education program with information items for city residents available through the community website and mass media distribution. Storm drain markers have been installed to educate residents about improper waste disposal. The city worked with the Summit Soil & Water Conservation District (SWCD) to meet the SWMP education goals for 2008.
- Macedonia has partnered with Tinkers Creek Watershed Partners to conduct a resident environmental awareness survey in 2007 and 2008. The results of this survey are expected to be utilized in planning future educational programs.
- Macedonia has established a Drainage and Sewer Control Committee (DSCC) to get input from area residents on storm water related actions. However, the city was deficient in holding additional public involvement activities in 2007, but did conduct a watershed cleanup in 2008. The city should provide more opportunities for citizens to get involved with watershed stewardship activities through additional public events, displays, and community service opportunities. It is expected that Macedonia will work with Tinkers Creek Watershed Partners and Summit SWCD to coordinate these activities.

#### Illicit Discharge Detection & Elimination (IDDE)

- Macedonia adopted an illicit discharge ordinance (Chapter 922 of the Macedonia Code of Ordinances) in 2004 that meets the requirements of the permit.
- Outfall mapping was completed in 2007. CTI Engineering has been contracted to complete a comprehensive MS4 system map pursuant to requirements in the upcoming renewal MS4 permit.
- The City has an agreement with Summit County Health Department to identify illicit discharges. All Home Sewage Treatment Systems (HSTS) have been identified and will be incorporated into the comprehensive MS4 map. Macedonia contracted with Tinkers Creek Watershed Partners in 2008 to conduct dry weather field screening to identify possible illicit discharges.
- No formal illicit discharge investigation procedures are in place. The City of Macedonia must develop and implement written procedures for all illicit discharge detection and elimination cases, including details on the responsibilities of each

department and their staff for responding to and reporting of any cases that may occur. This includes development of an illicit discharge event tracking database that can be incorporated into the records of the SWMP. These procedures should be implemented in early 2009.

#### Construction Site Runoff Control/Post Construction Storm Water Management

- Macedonia passed their stormwater erosion and sediment control regulations, Chapter 923 of the Macedonia Code of Ordinances, in 2007. These regulations incorporate post-construction regulations as required by the MS4 permit. The regulations include an enforcement mechanism and procedures for compliance.
- The city has entered into a Memorandum of Understanding (MOU) with Summit SWCD to review all construction site Storm Water Pollution Prevention Plans (SWPPPs) and conduct site inspections on a regular basis. However, construction site storm water violations noted in Summit SWCD inspection reports are not being addressed by the City in a timely manner. The City must implement the enforcement procedures detailed in their ordinance to address violations noted by Summit SWCD.
- The ordinance requires the submission of maintenance inspection requirements and schedules, including long-term maintenance requirements, with the SWPPP submission. If the city has not already done so, it should adopt formal long-term operation and maintenance agreement language for use with all construction projects as well as for all post-construction BMPs.
- Macedonia adopted Riparian and Wetland Setback legislation, Chapter 924, in 2007. Summit SWCD provides assistance in identifying setback boundaries and conducting inspections. Please submit, with future annual reports, copies of all variances granted under this ordinance, along with details of actions taken to mitigate for damages to or to offset losses incurred by the variances.

#### Good Housekeeping/Pollution Prevention

- In 2007 Macedonia implemented programs to control or reduce pollutants from municipal owned facilities and infrastructure. These included catch basin cleaning/street sweeping programs and vehicle/equipment washing procedures.
- Macedonia has partnered with the Tinkers Creek Watershed Partners to develop written SWPPPs for their municipal facilities. Once developed, Macedonia should fully implement these plans and continue to update and improve them. Further, all deficiencies noted during regular inspections should be addressed appropriately.

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- It is recommended that the Storm Water Program Manager refine the duties of all City Departments and Divisions to clarify the job duties, training, and reporting requirements of all municipal staff under the storm water program. The renewal MS4 permit, to be issued this year, will require the development of a table of organization to formalize your SWMP structure.

Please review these comments and provide me with a letter of response indicating the actions you will take to address all noted deficiencies. **Your response should be received by February 13, 2009.**

Should you have any questions, please contact me at (330) 963-1117.

Sincerely,



Kelvin Rogers  
Environmental Specialist  
Division of Surface Water

KR/mt

cc:

Honorable Don Kuchta, Mayor, City of Macedonia  
James Crevar, Director of Public Service, City of Macedonia  
David White, Summit County Engineers  
Cindy Fink, Summit SWCD  
Anthony Robinson, Ohio EPA, DSW, CO