

**Environmental  
Protection Agency**

**Governor  
Lt. Governor  
Director**

November 2, 2011

RE: CUYAHOGA COUNTY  
VILLAGE OF NORTH RANDALL  
MUNICIPAL STORM WATER PROGRAM  
ILLICIT DISCHARGE INVESTIGATION

**CERTIFIED MAIL**

David Smith, Mayor  
Village of North Randall  
21937 Miles Rd.  
North Randall, OH 44128

Dear Mayor Smith:

On May 12, 2010, Ohio EPA conducted an audit of the Village of North Randall's municipal storm water program. During that audit, we noted that the Cuyahoga County Board of Health had identified dry weather flows from nine (9) outfalls of the Village of North Randall municipal separate storm sewer system (MS4). In our audit report dated July 9, 2010, we notified you that you are not in compliance with Part III.B.3.e of the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewer Systems (MS4s) #3GQ00031\*BG for failure to identify the sources of illicit discharge and eliminate sources not listed in Part III.B.3.g of the permit. In your response letter dated March 9, 2011, you indicated that the Village would conduct an additional dry weather screening of the nine (9) outfalls in question, confirm if each outfall is part of the MS4, track the source of the flow, pinpoint the source(s), and, for verified sources of illicit discharge, utilize the procedures set forth in Chapter 1048 of the municipal code to eliminate them. These actions were to be completed by September 1, 2011.

On October 13, 2011, Ohio EPA received the 2010 Annual Report required under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewer Systems (MS4s) #3GQ00031\*BG. In reviewing the report, it appears that the Village had not conducted the additional dry weather screening of the nine (9) outfalls, had not performed the follow-up investigations to track and determine sources of dry weather flow, and had not taken action to eliminate sources of illicit discharge by the end of 2010.

The purpose of this letter is to determine if the stated actions to identify and eliminate illicit discharges have been completed by September 1, 2011. Please provide me with an indication of whether the required actions have been completed, and if so, a summary of your findings and

outcomes **no later than November 18, 2011**. Laboratory test results, photographs such as stills from sewer line cameras or dye testing, mapping of sources and other such documentation demonstrating the completion of the stated activities is to be included with your response. If you have not yet completed the stated actions, please provide me with a letter of explanation by this same date.

Please be aware that failure to implement a plan to detect and eliminate non-storm water discharges to the MS4, including illegal dumping, is a violation of Part III.B.3.e of the NPDES permit. Failure to comply with the provisions of the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07 and is punishable by fines of up to \$10,000 per day of violation.

Finally, in reviewing the 2010 Annual Report, we noted that you did not include a Table of Organization for your MS4 program, as required by Part IV.C.1 of the NPDES permit. Please include the Table of Organization for your municipal storm water program with your response to the illicit discharge matter. Further, provide me with a signed copy of the current Memorandums of Understanding (MOU) with the Cuyahoga County Board of Health, the Cuyahoga County Department of Public Works, the Northeast Ohio Regional Sewer District (NEORS) or any other third party that provides the Village with illicit discharge detection and elimination services.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski  
District Engineer  
Division of Surface Water

DB/cs

cc: Don Bierut, P.E., Engineer, Village of North Randall  
Richard Sokolowski, Service Director, Village of North Randall  
Laura Travers, Cuyahoga County Board of Health  
Ann Gliha, Cuyahoga County Dept. of Public Works  
Scott Broski, Northeast Ohio Regional Sewer District

ec: Mark Mann, Enforcement and Storm Water Program Manager, DSW, CO

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**Environmental  
 Protection Agency**

Governor  
 Lt. Governor  
 Director

November 2, 2011

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CERTIFIED MAIL

David Smith, Mayor  
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 North Randall, OH 44128

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1. Article Addressed to:

DAVID SMITH, MAYOR  
 VILLAGE OF NORTH RANDALL  
 21937 MILES RD.  
 NORTH RANDALL, OH 44128

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