



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 9, 2012

RE: LORAIN COUNTY
EATON TWP
MUNICIPAL STORM WATER
ANNUAL REPORT REVIEW – 2011

Facility Permit No: 3GQ00109*BG
Date of Initial Permit Coverage: 4/7/03
Date of NPDES Permit Renewal: 6/3/09

Richard Knechtges
Eaton Township
12043 Avon Belden Rd.
Grafton, OH 44044

Dear Mr. Knechtges:

On February 29, 2012, Ohio EPA received a copy of the annual report required by the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewer Systems (MS4s) #OHQ000002. Upon review, Ohio EPA has determined the following:

The annual report for reporting year 2011 is incomplete. In particular, the annual report does not provide the following information:

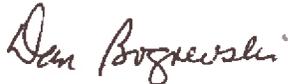
- The Table of Organization does not identify how implementation of your MS4 program occurs across multiple positions, agencies and departments. Please specify the lines of communication between the parties involved in implementation of your MS4 program.
- The Annual Report indicates that Eaton Township uses the Lorain County Community Development Department, Lorain County General Health District, Lorain County Emergency Management Agency, Lorain County Solid Waste Management District, Lorain County Engineer and the Lorain County Soil & Water Conservation District (SWCD) to conduct all or part of the public education, illicit discharge, construction and post-construction programs. The Memorandums of Understanding (MOUs) between Eaton Township and these third parties has not been provided. Please submit a current, signed copy of these MOUs or contracts.

- There is a discrepancy in the numbers for storm water pollution prevention plan review and construction site inspection reported in the Annual Report and the information contained in Attachment B, provided to you by Lorain SWCD. Ohio EPA only counts eight plan reviews and only 13 site inspections in Attachment B. Further, Appendix B does not indicate that inspection frequency has been once per month, yet you have reported this as the average site inspection frequency. Please review the information submitted and amend the annual report as needed to provide accurate information. As guidance for developing your list for Attachment B, please see attached.

Please submit the items necessary to complete your annual report **no later than April 1, 2012**.

If you have any questions, please contact me at (330) 963-1145 or Jason Fyffe in our Central Office at (614) 728-1793.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

cc: Trustees, Eaton Township
Don Romancak, Lorain County Community Development Department
John Niedzialek, Lorain SWCD
Jim Boddy, Lorain County General Health District
Tom Kelley, Lorain County Emergency Management Agency
Bill Holtzman, Lorain County Engineer

ec: Jason Fyffe, Ohio EPA, DSW, CO