



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 12, 2012

RE: LORAIN COUNTY
GRAFTON TOWNSHIP
MUNICIPAL STORM WATER
ANNUAL REPORT REVIEW – 2011

FACILITY PERMIT NO: 3GQ00051*BG
DATE OF INITIAL PERMIT COVERAGE:4/1/2003
DATE OF NPDES PERMIT RENEWAL:10/14/2009

Jean Haight
Trustee-Recycling & Storm Water Coordinator
Grafton Township
34430 Law Road
Grafton, OH 44044

Dear Ms. Haight:

On March 22, 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:

- A Table of Organization identifying the name and contact information for the party responsible for overall management and implementation of your program and each of the six minimum control measures. Guidance on developing a table of organization can be found on our website at <http://www.epa.ohio.gov/Default.aspx?tabid=2697>.
- Grafton Township uses the Lorain County Health Department to conduct parts of the Illicit Discharge program and Lorain County Soil & Water Conservation District to conduct parts of the Construction and Post-Construction programs. The Memorandum of Understanding (MOU) between Grafton Township and the Lorain County Health Department has not been provided. Please submit a current, signed copy of this MOU or contract.

Finally, the annual report indicates the following possible areas of non-compliance with performance standards contained within the NPDES permit:

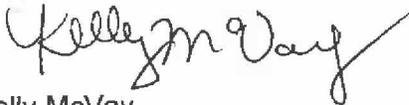
- **Dry Weather Screening of MS4 Outfalls** – Grafton Township did not conduct any dry weather screening of MS4 outfalls during the reporting period. Please be aware that you must conduct dry weather screening of 100% of your outfalls by the end of the current NPDES permit term.

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Please submit the items necessary to complete your annual report and, if violations or possible non-compliance are noted above, please provide me with a letter of response indicating the actions taken to correct these violations. For actions yet to be completed, provide me with a schedule by which corrective action will be complete. If we have incorrectly identified violations or areas of possible non-compliance, please provide a letter of explanation and documentation to support your position. Your response should be received no later than **June 27, 2012**.

If you have any questions, please contact me at (330) 963-1125 or via e-mail at kelly.mcvay@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink that reads "Kelly McVay". The signature is written in a cursive style with a long, sweeping tail on the "y".

Kelly McVay
Assistant to the District Engineer
Division of Surface Water

KM/cs

cc: Jason Fyffe, Ohio EPA, DSW, CO