



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 12, 2012

RE: STARK COUNTY
JACKSON TOWNSHIP
MUNICIPAL STORM WATER
ANNUAL REPORT REVIEW – 2011

FACILITY PERMIT NO: 3GQ00052*BG
DATE OF INITIAL PERMIT COVERAGE: 4/1/2003
DATE OF NPDES PERMIT RENEWAL: 6/3/2009

Marilyn Lyon
Township Administrator
Jackson Township
5735 Wales Avenue NW
Massillon, OH 44646

Dear Ms. Lyon:

On March 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:

- Jackson Township uses the Stark Soil & Water Conservation District to conduct parts of the Construction and Post-Construction programs and the Stark County Health Department to conduct parts of the Illicit Discharge program. The Memorandum of Understanding (MOU) between Jackson Township and these third parties has not been provided. Please submit a current, signed copy of these MOUs or contracts.

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

- **Mapping of MS4** – Jackson Township has not completed the mapping of their municipal separate storm sewer system within the Urbanized Area (UA). Please be aware that mapping of outfalls was to be completed by end of your initial NPDES permit coverage. Mapping of the rest of the system must be completed within five years of NPDES permit renewal. Mapping is to include catch basins, pipes, ditches, flood control facilities, all publicly-owned post-construction water quality BMPs and those private post-construction water quality BMPs installed to meet requirement of the Ohio EPA NPDES permit for construction activities and/or your local post-construction ordinance.
- **Storm Water Pollution Prevention Plan (SWP3) Plan Review and Site Inspection** – During the reporting period, Ohio EPA issued NPDES permit coverage to the following construction sites within your community:

- o Greenwich Place – 3GC05372*AG
- o Jackson Multi-Purpose Turf Project – 3GC05590*AG
- o Open Land, Greenbriar Group, LLC – 3GC05584*AG
- o Kenan Advantage Group Corporate Headquarters – 3GC05674*AG
- o Frank Avenue Phase 1 – 3GC05511*AG
- o Hills & Dales Road – 3GC05704*AG
- o Stark State College Wind Energy Research & Development Center – 3GC05507*AG
- o Outlots at the Strip – 3GC05340*AG

The Ohio EPA NPDES list contains construction activities not found on your community's list of construction activities subject to SWP3 review and site inspection. This may indicate that you are not performing plan review and site inspection as required by your municipal storm water permit. For each instance where a site appears on the Ohio EPA NPDES permit list, but the site does not appear on your list, please provide an explanation as to why your community did not conduct a SWP3 review or site inspection.

- **Post-Construction BMP Verification** – During the reporting period, Ohio EPA received Notices of Termination for the following construction sites within your community:
 - o Faith Family Church – 3GC03598*AG
 - o Portage Street 16" Water Line – 3GC03645*AG
 - o Hill & Dales Road – 3GC04226*AG
 - o Walgreens North Canton – 3GC03619*AG
 - o American Benefits Management – 3GC00012*AG
 - o Munson South – 3GC02839*AG
 - o Akron-Canton Airport Pipeline Relocation – 3GC02292*AG
 - o Liquid Control Division, Graco Inc. -3GC02240*AG
 - o Rose Lane Health Center – 3GC02825*AG
 - o Jackson Memorial Middle School – 3GC00826*AG
 - o Jackson Family Practice Inc. – 3GC04976*AG
 - o Jackson Twp-Strausser Street Park Soccer Fields – 3GC04562*AG
 - o 4060 Fulton Office Bldg, Scheetz Bldg Corp – 3GC03118*AG
 - o Wayview Site, Shumacher Construction Co. – 3GC01493*AG
 - o Project No. 550 Jackson & Gowin Meadows San Sewer – 3GC04378*AG
 - o P-545 Cloverdale/Sommerst Allot Area Sani Swr – 3GC02048*AG
 - o Stark State College – New Health Bldg – 3GC03268*AG
 - o Fuel Cell Building Additions, Stark State College of Technology – 3GC04443*AG
 - o Stark State College of Technology, NE Corner of Frank Rd & Mega Dr – 3GC01761*AG
 - o Stark State College of Technology, Strip Ave – 3GC02116*AG
 - o Stark State College of Technology, Frank Rd – 3GC03202*AG

Post-construction BMPs were required to be installed and a long-term maintenance agreement was to have been developed for post-construction BMPs at these sites. For each of these sites, please indicate the post-construction BMPs installed and indicate if you have conducted an inspection to verify their installation.

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,



Kelly McVay
Assistant to the District Engineer
Division of Surface Water

KM/cs

cc: James N. Walters, President, Jackson Township Board of Trustees, Jackson Township
Julie Berbari, Stark Soil & Water Conservation District

ec: Jason Fyffe, Ohio EPA, DSW, CO