



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 20, 2012

RE: SUMMIT COUNTY  
VILLAGE OF CLINTON  
MUNICIPAL STORM WATER  
ANNUAL REPORT REVIEW – 2011

FACILITY PERMIT NO: 3GQ00065\*BG  
DATE OF INITIAL PERMIT COVERAGE: 4/3/2003  
DATE OF NPDES PERMIT RENEWAL: 6/17/2009

Al Knack  
Mayor  
Village of Clinton  
7871 Main Street  
Clinton, OH 44216

Dear Mr. Knack:

On March 27, 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>.
- The Village of Clinton uses the Summit Soil and Water Conservation District to conduct parts of the Construction and Post-Construction programs. The Memorandum of Understanding (MOU) between the Village of Clinton and the Summit SWCD has not been provided. Please submit a current, signed copy of these MOUs or contracts.
- The Illicit Discharge Detection and Elimination page of the annual report was not complete. It must provide the number of outfalls, outfalls screened, and outfalls with dry-weather and illicit flows. An attachment that provides schedules for the elimination of illicit connections that have been identified but not yet eliminated must also be provided. Please list each remaining incidence of known illicit connection, the address or other location indicator, a brief description of the situation and provide a schedule for its elimination.

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

- **Regulatory Mechanisms for Illicit Discharge, Construction, and Post-Construction** - The Village of Clinton did not provide copies of their ordinances pertaining to Illicit Discharge, Construction, and Post-Construction regulations and these ordinances could not be found via their website. Please be aware that failure to enact these regulator measures, should this be the case, and comply with the NPDES permit is a violation of Ohio Revised Code 6111.07 and is subject to penalties. Provide copied of these ordinances with your letter of response.
- **Public Education and Outreach** – The Village of Clinton only conducted one public education and outreach program for a storm water theme or message during the reporting period. Please be aware that the NPDES permit requires you to conduct at least five storm water education campaigns during the current NPDES permit term, with at least one campaign targeting the development community. Education campaigns must employ more than one mechanism of message delivery.
- **Public Participation and Involvement** – The Village of Clinton only conducted one public involvement activity during the reporting period. Please be aware that the NPDES permit requires you to conduct at least five public involvement activities during the current NPDES permit term.
- **Mapping of MS4** – Because the Village of Clinton did not complete this section of the Illicit Discharge portion of the annual report, it is assumed that the Village of Clinton 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.
- **Mapping of Home Sewage Treatment Systems (HSTs)** – Because the Village of Clinton did not complete this section of the Illicit Discharge portion of the annual report, it is assumed that the Village of Clinton has not submitted a list of all HSTs within the UA that discharge to the MS4 and a storm sewer map showing their location. Please be aware that this list and map were to be completed within 5 years of your initial NPDES permit coverage.
- **Dry Weather Screening of MS4 Outfalls** – Because the Village of Clinton did not complete this section of the Illicit Discharge portion of the annual report, it is assumed that the Village of Clinton 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.

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

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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 **July 6, 2012**.

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

Sincerely,



Kelly McVay  
Assistant to the District Engineer  
Division of Surface Water

KM/cs

ec: Jason Fyffe, Ohio EPA, DSW, CO  
Phil Rhodes, Ohio EPA, DSW, NEDO