



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 25, 2012

RE: SUMMIT COUNTY  
TWINSBURG TOWNSHIP  
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

Todd Johnson  
Service Coordinator  
Twinsburg Township  
1790 Enterprise Parkway  
Twinsburg, OH 44087

Dear Mr. Johnson:

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:

- Twinsburg Township uses the Summit Soil and Water Conservation District to conduct parts of the Public Education and Outreach, Public Involvement and Participation, Construction, and Post-Construction programs and the Summit County Health District to conduct parts of the Illicit Discharge program. The Memorandum of Understanding (MOU) between Twinsburg Township and these third parties has not been provided. Please submit a current, signed copy of these MOUs or contracts.
- An attachment that identifies the construction sites within your jurisdiction that are subject to storm water pollution prevention plan (SWP3) review and site inspection. Identify construction start and end dates, as appropriate, and the NPDES facility permit number of each construction activity listed. For subdivided development, please provide a list of individual lots within the development, either by address or subplot number, upon which construction occurred during this reporting period, e.g., individual home building lots within a residential subdivision. Provide an indication as to whether or not your program includes inspection of individual lot construction.

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

- **Mapping of MS4** – Twinsburg 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.
- **Mapping of Home Sewage Treatment Systems (HSTSs)** – Twinsburg Township has not submitted a list of all HSTSs 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 five years of your initial NPDES permit coverage.

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 **July 10, 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

cc: Trustee James Balogh, Twinsburg Township  
Trustee Jamey DeFabio, Twinsburg Township  
Trustee Thomas Schmidt, Twinsburg Township

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