



**Environmental  
Protection Agency**

**John R. Kasich, Governor**  
**Mary Taylor, Lt. Governor**  
**Scott J. Nally, Director**

June 27, 2012

**RE: SUMMIT COUNTY  
BATH 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**

William E. Snow  
Township Administrator  
Bath Township  
3864 W Bath Road  
Akron, OH 44333

Dear Mr. Snow:

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:

- Bath Township uses the Summit Soil and Water Conservation District to conduct parts of the Public Education and Outreach and Public Involvement programs and the Summit County Health District to conduct parts of the Illicit Discharge program. The Memorandum of Understanding (MOU) between Bath Township and these third parties has not been provided. Please submit a current, signed copy of these MOUs or contracts.
- An attachment that provides schedules for the elimination of illicit connections that have been identified but not yet eliminated. 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.
- 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 Home Sewage Treatment Systems (HSTSs)** – Bath 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 13, 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: Becky Corbett, President, Bath Township Board of Trustees

ec: Jason Fyffe, Ohio EPA, DSW, CO