



**Environmental  
Protection Agency**

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

RE: Wood County  
Wood County, Lake, Perrysburg and  
Middleton Townships  
MUNICIPAL STORM WATER  
ANNUAL REPORT REVIEW – 2012  
NOTICE OF VIOLATION

July 5, 2012

Mr. Kevin Laughlin  
Wood County  
One Courthouse Square  
Bowling Green, Ohio 43402

Dear Mr. Laughlin:

On March 28, 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 2012 is incomplete. In particular, the annual report does not provide the following information:

- Wood County, along with Perrysburg, Lake and Middleton Townships (Wood County et al.) use the Wood County Solid Waste Division, the Wood County Park District and the Wood County Soil & Water Conservation District to conduct the MCM 1 & 2 program. The Memorandum of Understanding (MOU) between Wood County et al. and the Wood County Solid Waste Division, the Wood County Park District and the Wood County Soil & Water Conservation District has not been provided. Please submit a current, signed copy of this (these) MOU(s) or contracts. Also, if a consulting engineer firm is providing services to accomplish any requirements of the MS4 permit, the MOU with that engineering firm should also be submitted.
- An attachment that provides the schedules for the elimination of illicit connections that have been identified but not yet eliminated. Please list each 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.

- A list of municipal facilities subject to the pollution prevention good housekeeping program.

Further, upon review of the annual report, it appears that Wood County et al. has not enacted the following required ordinances or resolutions, or met the following NPDES permit requirements:

- **Illicit Discharge Detection and Elimination** – Failure to enact an ordinance or resolution to prohibit illicit discharges into your municipal separate storm sewer system is a violation of Part III.B.3.d of the NPDES permit. This ordinance or resolution was to be enacted no later than five years from the date of your initial NPDES permit coverage.
- **Construction Site Runoff Control** – Failure to enact an ordinance or resolution that requires the implementation of sediment and erosion controls and controls for other pollutants on construction sites where the larger common plan of development or sale disturbs one or more acre. This ordinance or resolution was to be enacted no later than five years from the date of your initial NPDES permit coverage.
- **Post-Construction Storm Water Management** – Failure to enact an ordinance or resolution that requires the implementation of post-construction best management practices to address the quality of post-development runoff from new development or redevelopment where the larger common plan of development or sale disturbs one or more acre. This ordinance or resolution was to be enacted within five years from the date of your initial NPDES permit coverage.
- **Employee Training on Pollution Prevention & Good Housekeeping Practices** – Wood County et al. does not identify any employee training for the reporting period. Please be aware that the NPDES permit requires employee training on storm water pollution prevention practices on an annual basis. Failure to conduct employee training during the reporting period is a violation of Part III.B.6.e of the NPDES permit.
- **Development of an SWP3 for Municipal Operations** – Wood County et al. does not indicate that they have developed an SWP3 for municipal facilities subject to industrial storm water permitting or for municipal facilities where operations described in 40 CFR Part 122.26(b)(14) occur. Please be aware that the NPDES permit required SWP3s to be developed and implemented at these facilities within two years of NPDES permit renewal. This is a violation of Part III.B.6.c of the NPDES permit.

Please be aware that failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.07 and is subject to penalties.

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

- **Public Education and Outreach** – 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. There is no identification of five different water education campaigns.

- **Public Participation and Involvement** – Please be aware that the NPDES permit requires you to conduct at least five public involvement activities during the current NPDES permit term. Only one activity was identified in the annual report.
- **Mapping of MS4** – Wood County et al. 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 the 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 requirements of the Ohio EPA NPDES permit for construction activities and/or your local post-construction ordinance.
- **Mapping of Home Sewage Treatment Systems (HSTs)** – Wood County et al. 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 five years of your initial NPDES permit coverage.
- **Dry Weather Screening of MS4 Outfalls** – Wood County et al. 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.
- **SWP3 Plan Review and Site Inspection** – See enclosed for a list of Ohio EPA issued NPDES permits during the reporting period to construction sites within your communities. The Ohio EPA NPDES list contains construction activities not found on your communities' 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 (NOTs) for the following construction site within your community:

Permit # 2GC02149; Starbright Professional Center; NW corner of SR 795 and Starbright Blvd; Perrysburg Township; by Buckeye Specialty Homes Co.

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.

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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 July 20, 2012.

If you have any questions, you may contact me at 419-373-3016.

Sincerely,



Patricia A. Tebbe, P.E.  
Division of Surface Water

/jlm

Enclosure

pc: Perrysburg Township Trustees  
Lake Township Trustees  
Middleton Township Trustees  
Wood County Commissioner  
Wood County Engineer

ec: Jason Fyffe, DSW, CO  
Tracking

Permit No.	Facility Name	Address	Township	Applicant
2GC02996	First Solar Ohio Test site	0 Cedar Park Blvd	Perrysburg	Bowers Asphalt & Paving
2GC02852	PDC Office Renovation	28157 Cedar Park Blvd	Perrysburg	Bowers Asphalt & Paving
2GC02852	PDC Office Renovation	28157 Cedar Park Blvd	Perrysburg	Program Solutions Group
2GC02855	Project Maltz	8041 Broadstone Rd.	Perrysburg	Geddis Paving & Excavating
2GC02855	Project Maltz	8041 Broadstone Rd.	Perrysburg	Program Solutions Group
2GC02895	Mei/Pce	28370 Kensington Lane	Perrysburg	Medical Evaluators Inc
2GC02782	WOO/LUC -475-3.68/0.00	1-475 bwtw SR 65 & US 24	Perrysburg	Miller Bros Construction
2GC02975	Oregon Rd Sanitary Sewer Ext	NW Corner of Oregon Rd & SR 795	Perrysburg	Reitzel Realty Co.