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

June 29, 2012

RE: STARK COUNTY
CITY OR TWP
MUNICIPAL STORM WATER
ANNUAL REPORT REVIEW – 2011

FACILITY PERMIT NO: 3GQ00072*BG
DATE OF INITIAL PERMIT COVERAGE: 4/3/2003
DATE OF NPDES PERMIT RENEWAL: 6/4/2009

Christopher D. Barnes
Assistant City Engineer
City of Canton
2436 30th St NE – Building A
Canton, OH 44705

Dear Mr. Barnes:

On March 26, 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:

- The City of Canton uses the Stark Soil and Water Conservation District to conduct parts of the Public Education and Outreach, Construction, and Post-Construction programs and the Health Department to conduct parts of the Illicit Discharge program. The Memorandum of Understanding (MOU) between the City of Canton 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.

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

- **Mapping of MS4** – The City of Canton 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-

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

construction water quality BMPs installed to meet requirement of the Ohio EPA NPDES permit for construction activities and/or your local post-construction ordinance.

- **Post-Construction BMP Verification** – During the reporting period, Ohio EPA received Notices of Termination for the following construction sites within your community:

  - Aultman Hospital – 3GC00377*AG
  - Nobles Pont Ctr – Rehabilitation & Nursing Care – 3GC00346*AG
  - Gervasi Winery – 3GC05304*AG
  - Beaver Excavating Co – 3GC00751*AG
  - Republic Storage Systems LLC – 3GC04006*AG
  - RTI Alloys, TPD Division – 3GC04005*AG
  - Alex D. Krassas Event Center – 3GC04487*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 **July 18, 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: Warren Price, Director of Public Service, City of Canton
William J. Healy II, Mayor, City of Canton

ec: Jason Fyffe, Ohio EPA, DSW, CO