



**Environmental  
Protection Agency**

John Kasich Governor  
Mary Taylor Lt. Governor  
Scott R. Smith Director

September 4, 2012

Delmar Perry  
City of Reynoldsburg  
7806 East Main Street  
Reynoldsburg Ohio 43068

**Re: City of Reynoldsburg  
Municipal Storm Water  
Annual Report Review – 2011  
Facility Permit No: 4GQ10002\*BG**

Dear Mr. Perry:

On March 12, 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 Table of Organization does not identify how implementation of your MS4 program occurs across multiple positions, agencies and departments. Please specify the lines of communication between the parties involved in implementation of your MS4 program.
- The City of Reynoldsburg uses Franklin Soil and Water Conservation District (FSWCD) to conduct all or part of the minimum control measures (MCM) program. The Memorandum of Understanding (MOU) between the City of Reynoldsburg and (FSWCD) has not been provided. Please submit a current, signed copy of this MOU or contract.
- An attachment that sufficiently 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** – It is unclear from your report whether Reynoldsburg has 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 5 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.
- **Dry Weather Screening of MS4 Outfalls** –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** – During the reporting period, Ohio EPA issued NPDES permit coverage to the following construction sites within your community:

Permit Number	Facility Name	Issue Date
4GC03547*AG	REYNOLDSBURG HIGH SCHOOL	5/23/2011
4GC03588*AG	7821 TAYLOR	7/11/2011
4GC03683*AG	LIVINGSTON AVE	11/2/2011
4GC03694*AG	DAIFUKU AMERICA CORP	11/14/2011
4GC03715*AG	WESLEY RIDGE	12/7/2011

The Ohio EPA NPDES list contains construction activities not found on your community's 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.

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 14 days from the receipt of this letter.

Delmar Perry  
City of Reynoldsburg  
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If you have any questions, please contact me at 614-728-3844 or  
Harry.Kallipolitis@epa.state.oh.us.

Sincerely,



Harry Kallipolitis  
Storm Water Coordinator  
Division of Surface Water  
Central District Office

c: City Council and Brad McCloud, Mayor of Reynoldsburg  
Franklin Soil and Water Conservation District

ec: Jason Fyffe, DSW, CO

HK/nsm Reynoldsburg 2011 Annual Report Review OHQ000002