



**Environmental
Protection Agency**

John Kasich Governor
Mike DeWine Lt. Governor
Scott M. R. Director

September 4, 2012

Brenda VanCleave
City of Pickerington
51 East Columbus Street
Pickerington, Ohio 43147

**Re: City of Pickerington
Municipal Storm Water
Annual Report Review – 2011
Facility Permit No: 4GQ10012*BG**

Dear Ms. VanCleave:

On March 22, 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:

- A Table of Organization identifying the name and contact information for the party responsible for overall management and implementation of your program and each of the six minimum control measures (MCMs). The Table of Organization is a graphical representation of 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. Guidance on developing a table of organization can be found on our website at <http://www.epa.ohio.gov/Default.aspx?tabid=2697>.
- 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:

- **Public Education and Outreach** – Your report indicates that 30% of your target audience (your population of 18,291) was reached by the rain barrel workshops that were conducted. Please confirm that nearly 5500 people were reached by these workshops, and explain what is meant by the term “reached”, as this figure seems high.
- **MS4 Ordinances** – The hyperlinks provided for the city code pertaining to IDDE, Construction Site Runoff Control, and Post-Construction Storm Water Management were broken. In future correspondence, please enumerate the section and chapter information in addition to a hyperlink for all ordinances.
- **Dry Weather Screening of MS4 Outfalls** – Pickerington 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.

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.

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 Lee Gray, Mayor Pickerington

ec: Jason Fyffe, DSW, CO