



Environmental
Protection Agency

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

August 31, 2012

Bill Harvey
City of Bexley
2242 East Main Street
Bexley, Ohio 43209

**Re: The City of Bexley
Municipal Storm Water
Annual Report Review – 2011
Facility Permit No: 4GQ00010*BG**

Dear Mr. Harvey:

This letter is written in review of your 2011 Annual Storm Water 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 Bexley works with the Friends of Alum Creek & Tributaries (FACT) to conduct all or part of the Minimum Control Measure (MCM) program. A Memorandum of Understanding (MOU) between The City of Bexley and FACT has not been provided. Please submit a current, signed copy of this MOU or contract.
- 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 (MCM 3).
- An attachment that identifies the construction sites within your jurisdiction that are subject to storm water pollution prevention plan (SWP3) review and site inspection. *In particular, 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 proper estimate of how many people were reached by your Public Education and Outreach efforts (MCM 1). To reiterate my statements from my audit letter dated January 20, 2011 "The current estimation, which states '100 percent of individuals who have Internet access and choose to look at the website', is not sufficient to meet the intent of this general permit condition."

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

- **Post-Construction Storm Water Management Ordinance (MCM 5)** – Your report indicates a Stormwater Design Manual. Please submit to my attention the ordinance that makes this document enforceable.
- **Mapping of MS4 (MCM 3)** – The City of Bexley 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 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. It was noted in the report that the mapping of outfalls was done in 2010 and that the full is projected to be completed by the end of 2012.
- **SWP3 Plan Review and Site Inspection (MCM 4)**– During the reporting period, Ohio EPA issued NPDES permit coverage to the following construction sites within your community:
 - 4GC03708*AG Bexley Park AMRP Project - Issue Date 11/30/2011
 - 4GC03706*AG Bexley Schools Cassingham Complex – Issue Date 11/22/2011

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.

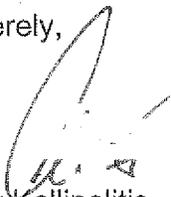
Please submit the items necessary to complete your annual report and, if violations or possible non-compliance are noted above, please provide me with a letter of response indicating the actions taken to correct these violations. For actions yet to be completed, provide me with a schedule by which corrective action will be complete. If we have

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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 Benjamin Kessler, Mayor of Bexley
David Hohmann, Chair-Watershed Watch Committee, Friends of Alum Creek and Tributaries

ec: Jason Fyffe, DSW, CO