



**Environmental  
Protection Agency**

John Kasich, Governor  
Mike Taylor, Lt. Governor  
Chris Evers, Director

September 4, 2012

Jeffery Feltz  
The City of Gahanna  
200 South Hamilton Avenue  
Gahanna, Ohio 43230

**Re: The City of Gahanna  
Municipal Storm Water  
Annual Report Review – 2011  
Facility Permit No: 4GQ10010\*BG**

Dear Mr. Feltz:

On April 2, 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 Gahanna uses OHM, and Franklin Soil and Water Conservation District (FSWCD) to conduct all or part of the Minimum Control Measure (MCM) program. The Memorandum of Understanding (MOU) between Gahanna and OHM and FSWCD has not been provided. Please submit a current, signed copy of these MOUs or contracts.
- An attachment that properly 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 Home Sewage Treatment Systems (HSTSs)** – The City of Gahanna has not submitted a list of all HSTSs 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 5 years of your initial NPDES permit coverage.
- **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
4GC03519* AG	CLUBHOUSE AT CENTRAL PARK GAHANNA	4/29/2011
4GC03520* AG	FORMER FUEL DEPOT	4/29/2011
4GC03521* AG	TECHCENTER/SCIENCE BLVD EXTENSION PHASE 1	5/3/2011
4GC03580* AG	BIG WALNUT TRAIL SECTION 1 & 2 TRAILWAY	6/29/2011
4GC03618* AG	MCKENNA CREEK STORMWATER MGT FACILITY	8/11/2011
4GC03640* AG	COLUMBIA GAS OF OHIO FACILITY	9/16/2011
4GC03681* AG	TECH CENTER COMMONS	11/2/2011

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.

- **Post-Construction BMP Verification** – During the reporting period, Ohio EPA received Notices of Termination for the following construction sites within your community:
  - 4GC03466\*AG      McDonalds Corporation - Issue Date: 12/29/11

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 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](mailto:Harry.Kallipolitis@epa.state.oh.us).

Sincerely,



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

c: City Council and Rebecca Stinchcomb, Mayor  
Rohnda O'Connell, OHM  
Franklin Soil and Water Conservation District

ec: Jason Fyffe, DSW, CO