



**Environmental
Protection Agency**

John Kasich, Governor
Paul Glavin, Lt. Governor
Tom R. Ichniowski, Director

September 4, 2012

Les Spring
The City of Grove City
4035 Broadway
Grove City, Ohio 43123

**Re: Grove City
Municipal Storm Water
Annual Report Review – 2011
Facility Permit No: 4GQ00003*BG**

Dear Mr. Spring:

This spring, Ohio EPA received a copy of your 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 Grove City uses Franklin County Board of Health (FCBOH) 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) outlining responsibilities between Gove City and FCBOH and FSWCD 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.
- 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:

- **Post-Construction Storm Water Management Ordinance**– It is unclear from your report what city ordinance is being used to enforce post-construction storm water management. Please clarify what “Part 11” is and where it can be found.
- **Public Education and Outreach and Public Participation and Involvement** – While commendable, some activities listed for MCM 1 and 2 are not clearly connected to storm water (eg: document shredding during the Community Environmental Day , distribution of reusable grocery bags and recycling bins, and Jackson Twp. Fall Clean-up). Please clarify the connection between these activities and your MS4 program. If there is no connection, these unrelated activities will not count towards the five themes or messages to be communicated over the permit term for MCM 1 and MCM 2.
- **Mapping of MS4** – It is noted Grove City has completed the mapping of its storm sewer outfalls. 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.
- **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
4GC03456*AG	WHITE ROAD RECONSTRUCTION PHASE 2	2/9/2011
4GC03488*AG	CREATIVE HOUSING XIII	3/16/2011
4GC03504*AG	FEDEX GROUND GROVE CITY	4/6/2011
4GC03526*AG	BIG RUN RIDGE SECTION 2 PT 1 & 2	5/6/2011
4GC03684*AG	STRINGTOWN ROAD CONSTRUCTION PHASE II	11/3/2011

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:

Permit Number	Facility Name	Issue Date
4GC03075*AG	SOLID WASTE AUTHORITY OF CENTRAL OH (SWACO)	1/21/2011
4GC03447*AG	KOHL'S DEPARTMENT STORE GROVE CITY	11/2/2011

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.

Sincerely,



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

c: Grove City Council and Richard Stage, Mayor
Franklin Soil and Water Conservation District
Franklin County Health Department

ec: Jason Fyffe, DSW, CO