



**Environmental
Protection Agency**

John Kasich Governor
Paul Glavin Lt. Governor
Scott Pruitt Director

September 4, 2012

Patrik Bowman
The City of Grandview Heights
1016 Grandview Avenue
Grandview Heights, Ohio 43212

**Re: The City of Grandview Heights
Municipal Storm Water
Annual Report Review – 2011
Facility Permit No: 4GQ00016*BG**

Dear Mr. Bowman:

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 Grandview Heights uses the Franklin County Board of Health to conduct all or part of the MCM program. The Memorandum of Understanding (MOU) between Grandview Heights and the Franklin County Board of Health has not been provided. Please submit a current, signed copy of this MOU or contracts.
- 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. During the reporting period, Ohio EPA issued NPDES permit coverage to the following construction sites within your community:
 - 4GC03474*AG Oakland Avenue Reconstruction - 2/25/2011

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

- **Public Education and Outreach, Public Involvement/Participation** – While commendable, the following BMP's for MCM 1 and MCM 2 are not related to storm water or the MS4 system, and will not count towards the performance standards of these measures: Tree City USA designation, Community Impact Project (Honeysuckle removal), Community Garden.
- **Construction Site Runoff Control**– The report indicates that Ohio EPA permit OHC000003 is the basis of the city ordinance which gives Grandview Heights the authority to enforce construction site runoff, but the ordinance itself is not listed. Please direct me to the portion of the city code where this ordinance can be found.
- **Mapping of MS4** – The City of Grandview Heights 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.

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 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 Ray DeGraw, Mayor
Franklin County Health Department

ec: Jason Fyffe, DSW, CO