



**Environmental
Protection Agency**

John Kasich, Governor
Steve LaTore, Lt. Governor
Robert M. Costello, Director

September 4, 2012

Rob Chandler
City of Worthington
380 Highland Avenue
Worthington, Ohio 43085

**Re: City of Worthington
Municipal Storm Water
Annual Report Review – 2011
Facility Permit No: 4GQ00017*BG**

Dear Mr. Chandler:

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 Table of Organization does not identify how implementation of your program and each of the six Minimum Control Measures (MCMs) is divided across multiple positions, agencies and departments. Guidance on developing a table of organization can be found on our website at <http://www.epa.ohio.gov/Default.aspx?tabid=2697>.
- The City of Worthington uses Franklin Soil and Water Conservation District (FSWCD) to conduct all or part of the MCM program. The Memorandum of Understanding (MOU) between Worthington and FSWCD 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.
- 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:

- **Mapping of MS4** – 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.
- **Mapping of Home Sewage Treatment Systems (HSTSs)** – It is not clear from your report if the City of Worthington has finished a map of all HSTSs within the UA that discharge to the MS4. Please be aware that a list and map of these systems were to be completed within 5 years of your initial NPDES permit coverage.

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 Matt Greeson, City Manager of Worthington
Franklin County Soil and Water Conservation District

ec: Jason Fyffe, DSW, CO