



**Environmental  
Protection Agency**

*Robert Taft* Governor  
*Paul Glavin* Lt. Governor  
*Robert M. B. Director*

September 4, 2012

Frank Wiseman  
City of Westerville  
21 South State Street  
Westerville, Ohio 43086

**Re: City of Westerville  
Municipal Storm Water  
Annual Report Review – 2011  
Facility Permit No: 4GQ00018\*BG**

Dear Mr. Wiseman:

On April 4, 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>.
- 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.

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)** – Westerville 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** – The inspection log is noted, but in the future, please provide an attachment that simply 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. For each site identified, indicate how many inspections were conducted by the City of Westerville during the reporting period.

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 City Manager, of Westerville

ec: Jason Fyffe, DSW, CO