



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 21, 2012

Danielle Maignan
Columbus Metro Parks
1069 West Main Street
Westerville, OH 43081

**Re: Notice of Violation
Columbus Metro Park District
Municipal Storm Water
Annual Report Review – 2011
Facility Permit No: 4GQ00020*BG**

Dear Ms. Maignan:

On April 27, 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:

- A Table of Organization identifying the name and contact information for the party responsible for overall management and implementation of your program and each of the six minimum control measures (MCMs). The Table of Organization is a graphical representation of how implementation of your MS4 program occurs across multiple positions, agencies and departments. Please specify the lines of communication between the parties involved in implementation of your MS4 program. Guidance on developing a table of organization can be found on our website at <http://www.epa.ohio.gov/Default.aspx?tabid=2697>.
- If Columbus Metro Parks uses any third parties (eg: an engineering firm) to conduct all or part of the MCM program, a Memorandum of Understanding (MOU) between Columbus Metro Parks and these third parties is required. Please submit current, signed copies of these MOUs or contracts if applicable.
- 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.

- A list of municipal facilities subject to the pollution prevention good housekeeping program. Please provide a detailed list; "All parks & facilities falling under the jurisdiction of the Columbus & Franklin County Metropolitan Park District" is not sufficient.

Further, upon review of the annual report, it appears that Columbus Metro Parks has not enacted the following required ordinances or resolutions, or met the following NPDES permit requirements:

- **Employee Training on Pollution Prevention & Good Housekeeping Practices** – Columbus Metro Parks does not identify any employee training for the reporting period. Please be aware that the NPDES permit requires employee training on storm water pollution prevention practices on an annual basis. *Failure to conduct employee training during the reporting period is a violation of Part III.B.6.e of the NPDES permit.* Please be aware that failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.07 and is subject to penalties.

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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: John O'Meara, Columbus Metro Parks

ec: Jason Fyffe, DSW, CO