



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

April 3, 2013

RE: CUYAHOGA COUNTY
CITY OF SEVEN HILLS
NOTIFICATION OF MUNICIPAL STORM
WATER INSPECTION
MCM#3: ILLICIT DISCHARGE PROGRAM

Mark Papke
Storm Water Program Coordinator
City of Seven Hills
7325 Summitview Dr
Seven Hills, OH 44131

Dear Mr. Papke:

This letter will serve as notice that Ohio EPA will be conducting an inspection of your community's Storm Water Management Program (SWMP). This inspection is being conducted to determine compliance with the Ohio EPA General Storm Water NPDES Permit for Small Municipal Separate Storm Sewer Systems (Small MS4s) #3GQ00102*BG.

Our inspection will focus on compliance with minimum control measure #3: Illicit Discharge Detection and Elimination. Our audit will be based on the audit guidance manual developed by the United States Environmental Protection Agency. We anticipate that the inspection can be conducted in one day; the interview portion of the inspection taking place in the morning, and the field inspections to occur in the afternoon. I have set aside the dates of April 23 or 25 to conduct the inspection. **Please contact me upon receipt of this letter to let me know which of these dates will work best for you.**

To streamline the inspection, please have the following resources ready and available on the date of the inspection.

- Ordinance prohibiting illicit discharges to the MS4 and establishing enforcement authority;
- If applicable, Memorandum of Understanding (MOU) or other written agreement between you and a third party providing MS4 mapping, post-construction BMP inventory management, dry weather screening, and other illicit discharge detection and/or elimination services;
- MS4 map, including inventory of post-construction BMPs;
- Map and address list of home septic treatment systems (HSTs) that discharge to your MS4 or that the local health department has determined to be not functioning as designed and intended;
- Illicit discharge investigation and response protocols, including an enforcement escalation plan or procedures;

- List of illicit discharges identified during the prior two years, including spill incidents and illegal dumping. Investigation and enforcement records related to these matters must also be available for review;
- Dry weather screening procedures, including any checklist or reporting form used to record observations;
- Spill response plan, including any checklist or reporting form used to document incidents;
- List of sanitary sewer overflow locations and known cross-connections between sanitary sewers and the MS4;
- Materials used to educate the public or train staff on identifying and reporting illicit discharges and managing used oil and other wastes;
- Staff training records.

Please ensure that records from the previous two years, including reports provided to you by the health department or other agency, are available for review. Ohio EPA will ask that copies of certain records be provided for our files.

The inspection will consist of an interview as well as a review of two or three illicit discharge case files. We will then conduct a field evaluation of your program with the time remaining. The field evaluation may include observation of outfalls, locations of sanitary sewer overflows, known cross-connections, areas with failing septic systems, and dry weather screening and sampling activities being conducted by your staff or third party agency,. We may also review equipment available for responding to illicit discharge events if time allows. Please have the appropriate persons available to answer the interview questions and to conduct the field evaluation. We anticipate that the interview and file review can be completed in the morning and the field review in the afternoon. Appropriate individuals may include, but are not limited to, the storm water program manager, city engineer, service director, streets department, health department, department of public works, police or fire department, or emergency response unit.

I look forward to working with you to perform the inspection. Please contact me to confirm the inspection date. Although we can consider other dates, we would appreciate your cooperation by selecting one of the dates proposed above. You can contact me at (330) 963-1145 or via e-mail at dan.bogoevski@epa.ohio.gov.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

Cc: Richard Dell'Aquila, Mayor, City of Seven Hills
Stuart Lovece, Service Director, City of Seven Hills
Laura Travers, Cuyahoga County Board of Health

Ecc: Molly Drinkuth, Ohio EPA, DSW, NEDO