



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

March 27, 2013

RE: CUYAHOGA COUNTY
CUYAHOGA COUNTY
MUNICIPAL STORM WATER
ANNUAL REPORTING

Ann Gliha
Cuyahoga County Department of Public Works
2100 Superior Viaduct
Cleveland, OH 44113

Dear Ms. Gliha:

Ohio EPA has received calls from communities concerned that they will not be able to meet the April 1 deadline to submit their 2012 Annual Report required under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewer Systems (MS4s) #OHQ000002. The Annual Report requires communities to report the amount of catch basin cleanings collected and disposed from their MS4s. The report is required to reflect the amounts collected during the calendar year, i.e., January 1 to December 31, of the reporting period. A number of communities in Cuyahoga County rely on your department to conduct these activities and provide them with the information for their annual reports. The County itself also requires this information for their report.

It is my understanding that the Department of Public Works will not be providing information for the fourth quarter of 2012 to the communities it serves until April 15, 2013. Thus, communities will not be able to accurately report their activities by the April 1 deadline established in their NPDES permits. Please provide me verification that my understanding of this situation is correct. If correct, please make changes for future years so that communities can receive the required information in time to meet the April 1st deadline. We recommend that the Memorandum of Understanding (MOU) between you and the municipalities and villages you serve establish a standard deadline by when the information is to be provided in the future, e.g., by February 28 of each year. For the current reporting year, i.e., 2012 annual reports, Ohio EPA has advised communities to submit the information for the first three quarters of the year by April 1 and then an addendum reflecting data from the 4th quarter of 2012 once the information is known.

ANN GLIHA
MARCH 27, 2013
PAGE 2

Please provide me with a response by April 8, 2013, as to whether my understanding of the situation is correct and if correct, the changes you will make to ensure this situation does not occur in the future. If you have any questions, please call me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB:bo

pc: Bryan Hitch, Sewer Maintenance Administrator

ec: Adrienne LaFavre, OCAPP, NEDO
Jason Fyffe, Supervisor, Storm Water Section, DSW, CO