



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

June 13, 2013

**Re:** Lawrence County  
City of Ironton  
MS4 Storm Water Activity  
Permit 0GQ00006\*AG

Mr. Rich Blankenship  
301 South 3rd Street  
Ironton, Ohio 45638

Dear Mr. Blankenship:

On June 5, 2013, Ohio EPA reviewed your 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. Ohio EPA has determined the following:

The annual report for reporting year 2012 is incomplete. In particular, the annual report does not provide the following information:

- The Memorandum of Understanding (MOU) between you and third parties has not been provided. Please submit a current, signed copy of this (these) MOU(s) or contracts. NOTE: Third parties should include consulting engineering firms if they provide services to accomplish requirements of the MS4 permit.
- 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.

### **PART III. B. 1. Public Education and Outreach on Storm Water Impacts**

Some of your outreach efforts do not appear to be working as well as they have in the past. Public participation seems to be lacking in some areas. Evaluate your approach to

determine if any new media outlets may be better. More newspaper articles, posters in well-traveled areas, or TV commercials may be better options to reach more individuals. If a more effective media outlet can be found you may remove the less effective media outlet from your goals.

Please be aware that the NPDES permit requires you to conduct at least 5 storm water education campaigns during the current NPDES permit term, with at least one campaign targeting the development community. Education campaigns must employ more than 1 mechanism of message delivery.

### **PART III. 2. Public Involvement/Participation**

This section of your annual report was blank. Was this intentional or just a mistake? Please amend this page and resubmit to reflect what actually occurred for the year. If nothing occurred for this measure express that on the amended page you return.

Please ensure that the public is made aware of public meetings in a fair and effective manner. Please be aware that the NPDES permit requires you to conduct at least 5 public involvement activities during the current NPDES permit term.

### **PART III. 3. Illicit Discharge Detection and Elimination**

Additional work must be completed concerning your HSTS mapping, IDDE plan, and dry weather screening of outfalls. Please let me know if I can help facilitate this action in any way.

Mapping of the system must be completed within 5 years of NPDES permit renewal unless you request an extension with a timeline for completion. 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.

Please be aware that the HSTS list and map are to be completed within 5 years of your initial NPDES permit coverage.

Please be aware that you must conduct dry weather screening of 100% of your outfalls by the end of the current NPDES permit term.

### **PART III. 4. Construction Site Storm Water Runoff Control**

You appear to be meeting the intent of the MS4 permit in this area.

**PART III. 5. Post-Construction Storm Water Management in New Development and Redevelopment**

Your reporting in this section is confusing to me. I was under the impression that you had passed the ordinance concerning post construction along with the ordinance concerning Construction Site Storm Water Runoff Control. If this is not the case provide to me a timeline on when it will be adopted.

**PART III. 6. Pollution Prevention/Good Housekeeping for Municipal Operations**

Your report states that a procedure exists for street sweeping but no estimate of what was swept up was given. Do you have a street sweeper? Where you able to utilize it during 2012? If so please provide an estimation of how much material was collected and disposed of.

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. In addition, federal law allows for third party lawsuits for failure to comply with your NPDES permit.

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 30 days from receipt of this letter.

If you have any questions, please contact me at (740) 380-5277.

Sincerely,



Aaron Wolfe  
Storm Water Section  
Division of Surface Water

AMW/dh