



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

June 13, 2013

**Re:** Coshocton County  
City of Coshocton  
MS4 Storm Water Activity  
Permit 0GQ00013\*AG  
Notice of Violation

Ms. Deb Bigelow  
724 South 7th Street  
Coshocton, Ohio 43812

Dear Ms. Bigelow:

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:

- 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. Guidance on developing a table of organization can be found on our website at <http://www.epa.ohio.gov/Default.aspx?tabid=2697>
- 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**

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

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

You appear to be meeting the intent of the MS4 permit in this area. Your MS4 appears to have excellent participation in all of the outreach programs.

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

Additional work must be completed concerning HSTS mapping, IDDE plan creation, and dry weather screening of outfalls. Please let me know if I can help facilitate these actions 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**

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

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

Training of city employees must be conducted. It appears no training was conducted during 2012.

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. 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