



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

June 17, 2013

RE: CUYAHOGA COUNTY
CITY OF NORTH OLMSTED
FINDINGS OF MUNICIPAL
STORM WATER PROGRAM
FOLLOW-UP INSPECTION

Pietro A. Difranco
City Engineer
City of North Olmsted
5200 Dover Center Road
North Olmsted, OH 44070

Dear Mr. Difranco:

On August 12, 2009, Ohio EPA conducted an audit of your municipal storm water program focused on the implementation of minimum control measure (MCM) #6: Pollution Prevention and Good Housekeeping for Municipal Operations. This program is a requirement of the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Small Municipal Separate Storm Sewers Systems (MS4s) OHQ000002 and Ohio Administrative Code 3745-39.

On May 23, 2013, Ohio EPA met with you, representing the City of North Olmsted, to determine if the violations and deficiencies noted during the MS4 program audit have been corrected. Our follow-up inspection revealed that violations noted during the MS4 program audit were corrected, but some deficiencies remain unaddressed:

- The City has not developed checklists to inspect the wastewater treatment plant for storm water pollution prevention practices. We strongly recommend the creation of storm water inspection checklists for the facility to standardize inspections and remind inspectors of the critical areas that must be reviewed during an inspection. Checklists should be included in the Storm Water Pollution Prevention Plan (SWPPP) for the facility.
- The City must assure that contract language/agreements specify that storm water best management practices (BMPs) be implemented by a third party, when said third party is relied upon to conduct a municipal operation or to enact BMPs. The City does perform periodic inspections of third party operations to assure BMPs are implemented. We encourage that the City continues performing those inspections. Please be sure to add this language to any future requests for proposal or contracts you sign with third party service providers whose activities can create storm water pollution.

- The City needs a more complete inventory of ALL private (installed since April 21, 2003) and publicly-owned post-construction BMPs. This includes the post-construction BMPs installed in the City Hall parking lot. Please be aware that the NPDES permit requires that these BMPs be shown on the MS4 system map. The map must be completed by June 3, 2014. A detailed description of each BMP, such as bioretention cells, permeable pavements, swales, etc., should be provided on the map.
- The City must develop standards and procedures for maintenance of post-construction BMPs. A checklist to conduct inspections has not been developed and there was no documentation to demonstrate that BMPs had been inspected and maintained. An effective program to ensure long-term maintenance of post-construction BMPs should include at least one inspection of every BMP by the City once every NPDES permit term.

Please provide me with a letter of response indicating the actions you will take to address the remaining deficiencies listed above. **Your response should be received no later than July 17, 2013.**

If you have any questions, please contact me at (330) 963-1128 or via email at robert.hrusovsky@epa.ohio.gov.

Sincerely,



Bobby Hrusovsky
Assistant to the District Engineer
Division of Surface Water

BH:ddw

cc: Scott Thomas, Director of Public Safety & Service, City of North Olmsted
Brian Blum, WWTP Superintendent, City of North Olmsted
ec: Dan Bogoevski, DSW, NEDO