



January 10, 2008

Butler County Township Association  
Attn. Christine Matacic, President  
6400 Princeton Road  
Liberty Township, Ohio 45011

Re: Draft NPDES Permit No. OHQ000002  
Household Sewer Treatment System (HSTS) Requirements

Dear Christine:

As you know, the Storm Water District (District) has been implementing Best Management Practices (BMP's) on behalf of Cities, Villages and Townships within the county for five years. Most of your colleagues joined the District to come into compliance with the federal National Pollutant Discharge Elimination Program (NPDES) under the Municipal Separate Storm Sewer System (MS4) permit. The permit term is for a period of five years at which the Ohio Environmental Protection Agency (OEPA) will amend the terms of permit coverage. This March will mark the ending of the first and beginning of the second permit term.

The District has reviewed the proposed revisions for the under the NPDES MS4 permit and discovered draft wording that should be of concern to the township trustees. Under the Illicit Discharge Detection and Elimination section (page 8 of 22) of the draft permit, the Director of the OEPA wants the District to require owners of HSTS to connect to public sewer. On the surface this requirement seems like a fair and reasonable requirement. However, what if the owner is a business that generates tax dollars for the community? Under this draft language the District would have to require the owner to connect to public sewer, possibly owned and operated by a municipality. This underlying potential of annexation is of great concern to the District, and possibly the Township Association.

Enclosed is a copy of the draft permit, public notice, and fact sheet for your review. If the draft wording in this permit is of concern to the trustees we strongly encourage the Association to send a letter to OEPA during the comment period.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric J. Pottenger".

Eric J. Pottenger  
Development / Storm Water Manager