



**Environmental
Protection Agency**

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

Re: Ashland County
Hedstrom Park
Construction
Storm Water

August 19, 2011

Mr. Scott Conery
Enterprise Parkway Leasing
1380 Enterprise Parkway
Ashland, Ohio 44805

Dear Mr. Conery:

On July 20, 2011, Ohio EPA representative Judson Delancey inspected Hedstrom Park at 1991 South Baney Road, Ashland. The purpose of the visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with construction activity, Facility ID No. 2GC02604*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Ohio EPA has no record of other permittees for this site.

As a result of the inspection, we have the following comments:

1. At the time of inspection, the site appeared to be almost complete. A building and parking lot were installed. Grass seed had been planted, but its growth was very sparse. The soil remains exposed and is very weathered.
2. Due to the lack of a construction trailer and personnel, the Storm Water Pollution Prevention Plan (SWP3) and inspection logs were unavailable for review.
3. Storm drain inlet protection had not been installed. A storm water pond was not evident. *Permit Requires:* Practices shall minimize sediment laden water entering active storm drain systems unless they drain to a sediment settling pond. *This is a violation of Part III.G.2.d.iv. of the permit.* Proper inlet protection or a sediment settling pond must be installed.
4. All temporary or permanent stabilization has not been established. The soil was very weathered and weeds were growing. The amount of weed growth and the weathered soil indicate that the timeframe for stabilization may have been exceeded.

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Permit Requires: Portions of the construction site that will be inactive for more than 21 days must have temporary stabilization initiated within the first seven. Temporary stabilization is required prior to the onset of winter weather for ground that will be idle over winter. Permanent stabilization is required within seven days on any portion of the site that has reached final grade or will be idle for longer than one year. Soil stabilization practices shall be initiated within two days on inactive, barren areas within 50 feet of a stream. Permanent seeding and mulching is required before construction activity is completed throughout the entire site. If seasonal conditions prohibit the establishment of vegetative cover, other means, such as mulching and matting, must still be used and maintained until more permanent methods can be implemented. *Failure to do so is a violation of Part III.G.2.b.i. of the permit.*

5. Please be aware that the SWP3 must contain a description of the post-construction Best Management Practices (BMPs) that will be installed during construction, including detail drawings, and the rationale for their selection. The rationale must address the anticipated impacts on the receiving stream's channel and floodplain morphology, hydrology, and water quality. Maintenance plans shall be provided by the permittee to the post-construction operator upon completion of construction activities.

The NOI indicates that Hedstrom Park is 20 acres, making it a large construction activity under the terms of the permit. As such, permanent structural post-construction Best Management Practices (BMPs) must be installed to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv shall be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. BMP types and drain times shall meet those in Table 2 of the permit. No structural post construction storm water management controls were evident. *This is a violation of Part III.G.2.e. of the permit.* Please send a written reply within ten days of the date of this letter describing how this requirement will be met. Your reply should include the type(s) of practices you are implementing, the basis for their design, and installation dates.

Within 10 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to prevent any future violations. Your response should include the dates, either actual or proposed, for the completion of the actions. If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Program

JD/jlm

pc: Shane Kremer, P.E., City of Ashland Engineer

 NWDO File