



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korietz, Director

August 13, 2010

RE: CUYAHOGA COUNTY
EUCLID CREEK BASIN
VILLAGE OF HIGHLAND HILLS
CUYAHOGA HILLS JUVENILE
CORRECTIONS FACILITY

Mr. Gary Schultz
State of Ohio Department of Youth Services
51 North High Street
5th Floor
Columbus, Ohio 43215

Dear Mr. Schultz:

On July 28, 2010, Ohio EPA conducted an inspection of the Cuyahoga Hills Juvenile Corrections Facility, located at 4321 Green Road, Village of Highland Hills, Cuyahoga County County (site). Ohio EPA records indicate that the site is covered by General National Pollutant Discharge Elimination System Permit for Storm Water Associated with Construction Activity (General Storm Water Permit), permit No. 3GC04552*AG. In attendance of the inspection were you, Dennis Gabalski, Maintenance Supervisor, and Jay Thomas of Lakeland Management Systems, Inc. The inspection documented the following deficiencies that require corrective actions to be implemented:

- Dewatering activities are being performed by pumping sediment-laden runoff and groundwater directly into the existing storm sewer serving the site (Figures 1 to 2). Dewatering activities must be performed utilizing a filter bag or other sediment removal best management practice;
- Inlet protection is depicted on the site's storm water pollution prevention plan (SWP3) to be installed on storm sewer inlets serving the site that have not been installed. Inlet protection must be installed in accordance with the SWP3;
- Silt fence has not been properly backfilled to allow for sediment-laden runoff to be treated correctly (i.e. via ponding) (Figure 3). All silt fence must be installed in accordance with the SWP3 and requires maintenance (i.e. trenched six inches into the ground and backfilled) in order to function correctly;
- The sediment basins depicted on the site's SWP3 have not yet been installed;
- A four inch drain line, located adjacent to the concrete staging area, discharges to the existing storm sewer system via an un-stabilized diversion channel (Figure 4). Erosion of the soil is occurring, which causes the discharge of sediment to occur to "waters of the state." The diversion channel must be stabilized to prevent erosion from occurring;

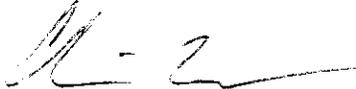
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- The drums and fifty-five gallon drums are located in an uncontained area where spills could be discharged directly to the storm sewer system serving the site (Figure 4). The drums and fifty-five gallon drums must have containment and cover be installed to minimize the potential for discharge to "waters of the state;"
- Construction vehicles are accessing the site in an area that is not served by a construction entrance (Figure 5). A properly designed construction entrance must be installed to minimize and prevent offsite tracking of sediment from occurring;
- The exposed storm sewer that will be extended currently has silt fence fabric installed to prevent sediment-laden runoff from discharging into the storm sewer system (Figure 6). A temporary riser pipe must be installed on the storm sewer inlet to prevent the discharge of sediment to "waters of the state;" and
- Dust control measures must be implemented to minimize offsite tracking of sediment.

A written report detailing how the above deficiencies will be addressed must be submitted to Dan Bogoevski of Ohio EPA within ten days of receiving this notification. The above deficiencies must be addressed within fourteen days of receiving this NOV.

Part III.C of the General Storm Water Permit requires the permittee to submit a copy of the site's SWP3 within ten days of receiving a request from Ohio EPA. **This notification also serves to formally request a copy of the site's SWP3 to be submitted to Mr. Bogoevski for review.** Should you have any questions regarding this matter, please contact Mr. Bogoevski at your earliest convenience at (330) 963-1145.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/mt

cc: Thomas O'Donnell, Village of Highland Heights
Gary Schultz, State of Ohio Department of Youth Services
Dennis Gabalski, State of Ohio Department of Youth Services
Jay Thomas, Lakeland Management Systems, Inc.

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO



Figure 1 - Dewatering activities are being performed by pumping sediment-laden runoff and groundwater directly into the existing storm sewer serving the site.



Figure 2 - Dewatering activities are being performed by pumping sediment-laden runoff and groundwater directly into the existing storm sewer serving the site.

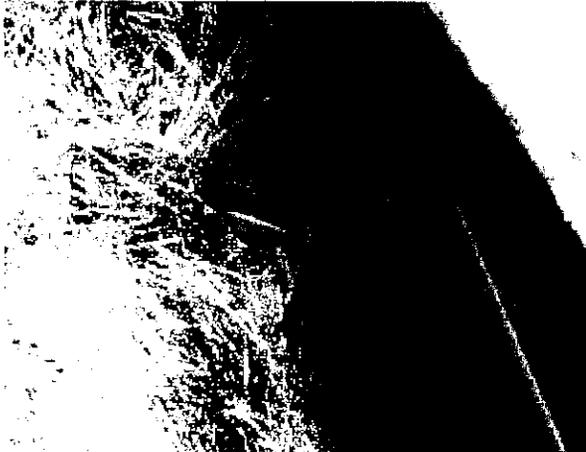


Figure 3 - Silt fence has not been properly backfilled to allow for sediment-laden runoff to be treated correctly.



Figure 4 - A four inch drain line, located adjacent to the concrete staging area, discharges to the existing storm sewer system via an un-stabilized diversion channel.



Figure 5 - Construction vehicles are accessing the site in an area that is not served by a construction entrance.



Figure 6 - The exposed storm sewer that will be extended currently has silt fence fabric installed to prevent sediment-laden runoff from discharging into the storm sewer system.