

August 23, 2011

RE: CUYAHOGA COUNTY
CITY OF PARMA
CONSTRUCTION STORM WATER
CAMP CORDE

Gerald R Jindra
Padua Franciscan High School
6740 State Rd.
Parma, OH 44134

and

Guy Cunningham
DiGoia-Suburban Excavating LLC
11293 Royalton Road
North Royalton, OH 44133

Dear Mr. Jindra and Mr. Cunningham:

On August 2, 2011, I performed a compliance inspection at the above referenced site located off Ridgewood Drive. My inspection was performed at the request of the City of Parma who has been receiving complaints from a downstream landowner concerned that uncontrolled runoff from this site is causing erosion on his property. I was accompanied by Melissa Morrow and Tony Vanello from the City of Parma Engineering Department. Our records indicate that storm water runoff from this site is authorized under the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC03152*AG.

My inspection revealed the following deficiencies in sediment and erosion control:

- **A diversion must be installed along the east side of the site to collect runoff and convey it to the sediment basin.** Grading on the east side of the project was not complete as of the date of inspection; however, it was evident that runoff was not being directed to the sediment basin as intended by the storm water pollution prevention plan (SWP3). Instead, a significant drainage area was being directed to silt fence placed parallel to the unnamed tributary of West Creek. The installation of a diversion at the top of the slope above the stream will reduce the drainage area controlled by the silt fence to within the limits established in the NPDES permit and ensure runoff from the larger drainage area is directed to the intended best management practice.
- **If the sediment basin will be converted to a permanent detention pond once construction is complete, the outlet protection provided at the outlet pipe of the sediment basin appears to be inadequate.** Per specifications contained in *Rainwater and Land Development, Ohio's Standards for Stormwater Management, Land Development and Urban Stream Protection* (Ohio Dept. of Natural Resources, 2006), the length and size of rip-rap outlet protection is dependent on the velocity at the pipe outlet and the diameter of the outlet pipe, however the minimum length is 4 feet. The rip-rap provided barely extends past the end of the outlet pipe. Further, a level spreader may be necessary to diffuse flow through the riparian area of the stream to minimize erosion (see enclosures).

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- **The drainage swale along the west side of the site must be stabilized and measures must be taken to minimize sediment-laden discharges to this swale.** The SWP3 shows silt fence as the primary control measure for runoff that flows toward the west side of the site; however, the construction of a drainage swale serves to collect and concentrate runoff flows. Please be aware that silt fence is not an appropriate BMP for concentrated flows of runoff. By stabilizing the drainage swale and placing silt fence, or other appropriate perimeter control, on the east side of the swale, you will ensure that silt fence is only treating sheet flow runoff and you will be providing a stable conveyance for concentrated flows, including any run-on from off-site areas. Ohio EPA recommends the use of (a) sod or (b) seed, erosion control matting and rock check dams to stabilize the west drainage swale.

Please review my comments and provide me with a letter of response indicating the actions you will take to address these deficiencies. Include any revisions made to the SWP3 required to address these comments. Your response should be received **no later than September 2, 2011**. Please be aware that failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07 and is punishable by fines of up to \$25,000 per day of violation.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,

Dan Bogoevski
District Engineer
Division of Surface Water

DB:bo

enclosure(s)

pc: Melissa Morrow, City of Parma Engineering Dept.
Todd Houser, Cuyahoga SWCD