

Environmental  
Protection Agency

Governor  
Lt. Governor  
Director

August 2, 2011

RE: LORAIN COUNTY  
CITY OF AVON  
CHESTER ROAD PROPERTY  
NPDES PERMIT NO. OHC000003  
OHIO EPA PERMIT NO. 3GC05363\*AG  
CONSTRUCTION STORM WATER

Mr. Carl Frey  
Richard E. Jacobs Group  
25425 Center Ridge Road  
Cleveland, OH 44145

Dear Mr. Frey:

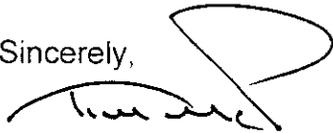
I am writing to inform you I am in receipt of your response dated July 27, 2011 to my letter dated July 19, 2011 regarding the Avon Chester Road Property. After review, I offer the following comments:

- **The Storm Water Pollution Prevention Plan (SWP3) is inadequate.**
  - The SWP3 must include a map showing the location of all erosion and sediment control practices, including locations likely to require temporary stabilization during the course of site development. The SWP3 provided simply delineates wetland areas that exist on site, and outlines the extent of disturbance that will occur. Further, there are no detail drawings for the construction of sediment and erosion controls. The SWP3 must contain detail drawings for all structural sediment control practices. Please amend the SWP3 as required to comply with these requirements.
- **Designated wetland areas and streams are vulnerable to sediment-laden runoff.**
  - All designated wetland areas on site **must** be protected from sediment-laden runoff. Silt fence or other perimeter control must be installed around the perimeter off **all** wetland areas and along stream channels **immediately**.
  - All areas disturbed (i.e. from grubbing, tree clearing, root raking) that remain idle for twenty one (21) days or greater must be temporarily stabilized to prevent excessive erosion. Since the area is being used for agricultural purposes, the area doesn't necessarily need to be seeded and mulched. Please contact Lorain SWCD (Soil and Water Conservation District) at 440/326/5800 for specifications and requirements for stabilizing land with agricultural use intended.

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Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your response must be received and corrective action completed by August 16, 2011. If corrective action cannot be completed by this date, your response should include the date by when corrections will be completed. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1128.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim McParland". The signature is written in a cursive style with a large, looped initial "T".

Tim McParland  
Assistant to the District Engineer  
Division of Surface Water

TM/mt

cc: Dan Bogoevski, DSW, NEDO  
Rob Knopf, Engineer, City of Avon  
James Smith, Mayor, City of Avon