

**Environmental  
Protection Agency**

**Governor  
Lt. Governor  
Director**

July 19, 2011

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

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

Dear Mr. Frey:

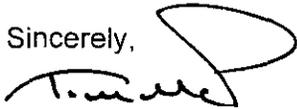
On July 13, 2011, Ohio EPA conducted an inspection of the Avon Chester Road Property project located at 35525 Chester Road, City of Avon, Lorain County. Ohio EPA records indicate that the site is covered by the General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activity (General Storm Water Permit), permit No. 3GC05363\*AG.. The inspection documented the following:

- There appeared to be possible wetland impacts on site. Wetland disturbance requires additional 401/404 permission from OEPA and the Army Corps of Engineers. Please provide documentation of such permission or explain the possible impacts noted. It was observed that wetlands were designated by stakes with pink or blue ribbon, but disturbance seemed to extend well into these designated areas (See Figures 1 & 2 & 3).
- No one was on site to provide me with a copy of the most recent Storm Water Pollution Prevention Plan (SWP3). The NPDES permit requires a copy must be present on site at all times. Please be sure that a copy of the plan is available, and send the most recent version to my attention via fax or e-mail.
- There appeared to be minimal erosion and sediment controls in place at this time. The NPDES permit requires that sediment and erosion controls be implemented within seven (7) days of initial disturbance of an acre or greater. Please be sure to implement all erosion and sediment controls detailed in the SWP3 immediately to prevent sediment laden watering from entering surface waters of the State (See Figure 4).
- There is sediment being tracked onto Schneider Road from construction vehicles. Please be sure to install an adequate construction entrance using two (2) inch diameter stone six (6) inches deep and seventy (70) feet in length to prevent sediment from being tracked off site. Also, be sure to remove any sediment already on the street using a street sweeper or some other equivalent method (See Figure 5).

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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 1, 2011. If corrective action cannot be completed by this date, your response should include the date by when corrections will be completed. Also, please fax a copy of your most recent storm water inspection report to my attention at (330) 487-0769 or via e-mail at timothy.mcparland@epa.state.oh.us. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1128.

Sincerely,



Tim McParland  
Assistant to the District Engineer  
Division of Surface Water

TM:bo

pc: Rob Knopf, City Engineer, City of Avon  
Lorain SWCD

ec: Dan Bogoevski, DSW, NEDO



Figure 1. Possible wetland impacts throughout the site.



Figure 2. Wetlands designated by small stakes with ribbon.

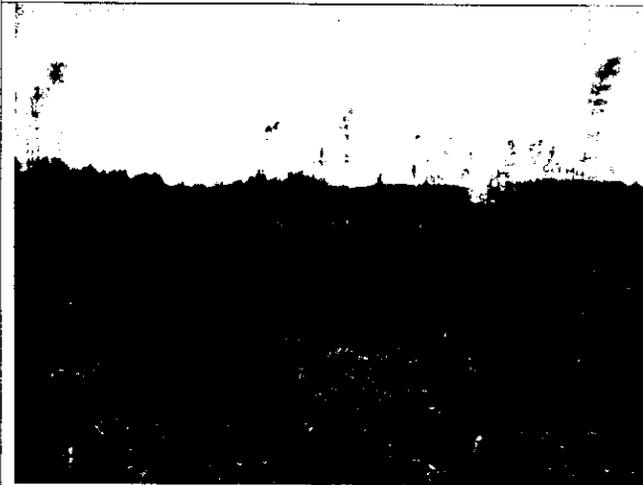


Figure 3. Very dark and saturated soils, as well as special types of vegetation suggest that a wetland was impacted.



Figure 4. The only sediment control visible was minimal amounts of silt fence.



Figure 5. Off site tracking from construction vehicles due to an inadequate construction entrance.