



Environmental  
Protection Agency

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

July 19, 2011

RE: STARK COUNTY  
CITY OF ALLIANCE  
DLW VENTURES LLC  
CONSTRUCTION STORM WATER

Mr. Doug Wonner  
Hettler Engineering LLC  
1225 N Main Street Suite A  
North Canton, OH 44720

Mr. John Alexander  
PAGS Excavating Inc  
141 Homeworth Road  
Alliance, OH 44601

Dear Mr. Wonner and Mr. Alexander:

On July 12, 2011, I, along with Julie Berbari of the Stark Soil & Water Conservation District (SWCD), performed an inspection at the above-referenced site to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05209\*AG. Our records indicate that Hettler Engineering LLC was granted coverage under the NPDES permit on December 9, 2010. Our records further indicate that PAGS Excavating Inc. submitted a Co-Permittee Notice of Intent on April 7, 2011.

During my inspection, I documented the following deficiencies:

1. Silt fence is needed along the south side of the site (Figure 1). Please install silt fence in this area to prevent sediment from leaving the site.
2. The sediment basin does not have an appropriate outlet structure (Figure 2), and as a result, sediment-laden water is leaving the site without being treated. **This is a direct violation of the NPDES permit.** You must install a properly-designed riser pipe or skimmer device to treat the water before it discharges offsite.
3. No inlet protection has been installed on the storm drains. You must install an approved form of inlet protection in accordance with the *Rainwater and Land Development Manual* (Ohio Department of Natural Resources, 2006), available online at <http://www.dnr.state.oh.us/tabid/9186/default.aspx>.
4. I was unable to locate a designated concrete washout on the site. According to the NPDES permit, water that comes in contact with concrete is considered waste water and cannot leave the site. As a result, you must designate contained

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areas for concrete washout, and these locations must be outlined in your Storm Water Pollution Prevention Plan (SWP3). Please install an appropriate washout before conducting any further work with concrete.

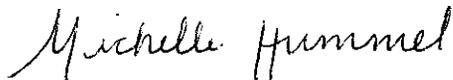
5. Much of the site lacks stabilization (Figures 3 and 4). Please seed and mulch the banks of the sediment basin to prevent erosion gullies from forming. In addition, if you will not be conducting further construction activities in any areas within the next 21 days, you must temporarily stabilize these areas within seven days of the last earth disturbance.

Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your response, along with any amendments to the SWP3, must be submitted to the Ohio EPA **no later than August 1, 2011**. If corrective actions are not completed by this date, please include a schedule that outlines when action will be taken. It is Ohio EPA's expectation that all of these deficiencies will be addressed within 10 days of receipt of this letter.

Finally, please fax a copy of your most recent storm water inspection report to my attention at (330) 487-0769 or via e-mail at [michelle.hummel@epa.state.oh.us](mailto:michelle.hummel@epa.state.oh.us). The NPDES permit requires you to inspect all storm water best management practices once every 7 days and within 24 hours of a 0.5-inch or greater rainfall. The results of these inspections must be documented as indicated in Part III.G.2.i of the NPDES permit.

If you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1128.

Sincerely,



Michelle Hummel  
Assistant to the District Engineer  
Division of Surface Water

MH/mt

cc: Curtis Bungard, Engineer, City of Alliance  
John Blaser, MS4 Program Manager, City of Alliance  
Toni Middleton, Mayor, City of Alliance  
Julie Barbari, Stark SWCD

ec: Phil Rhodes, DSW, NEDO



Figure 1 – Silt fence is needed along the south side of the property.



Figure 2 – The sediment basin lacks an appropriate outlet structure.



Figure 3 – The banks of the sediment basin lack stabilization.



Figure 4 – Much of the site lacks stabilization, including the soil stockpile.