



Environmental  
Protection Agency

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

July 8, 2011

RE: SUMMIT COUNTY  
CITY OF HUDSON  
HUDSON MIDDLE SCHOOL  
FOOTBALL FIELD  
CONSTRUCTION STORM WATER

Mr. Chuck Schilling  
Hudson Middle School  
2440 Hudson-Aurora Road  
Hudson, OH 44236

Mr. Scott Wagner  
Regency Construction Services Inc.  
14600 Detroit Avenue  
Lakewood, OH 44107

Dear Mr. Schilling and Mr. Wagner:

On June 22, 2011, I, along with Cindy Fink of the Summit 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 #3GC05373\*AG. Our records indicate that Hudson Middle School was granted coverage under the NPDES permit on March 31, 2011. Our records further indicate that Regency Construction Company Inc. submitted a Co-Permittee Notice of Intent on April 19, 2011.

During my inspection, I documented the following deficiencies:

1. The silt fence needs maintenance in some areas (Figures 1-3). Please reinstall silt fence in these locations and ensure that the ends are wound together properly and that the geotextile fabric is trenched six inches into the ground.
2. The inlet protection needs maintenance. The frames surrounding the storm drains are not built properly and should be modified per the specifications given in the *Rainwater and Land Development Manual* (Ohio Department of Natural Resources, 2006), available on-line at <http://www.dnr.state.oh.us/tabid/9186/default.aspx>. In addition, sediment is present on the grates in some locations (Figure 4), and geotextile fabric is being used as a secondary sediment control. Simply placing a piece of geotextile under the grate is not an approved form of inlet protection. Please remove all sediment from the storm drains and replace the existing geotextile fabric with Dandy Bags or another approved storm drain inlet protection measure.

Mr. Chuck Schilling and Mr. Scott Wagner  
Hudson Middle School Football Field  
July 8, 2011  
Page 2

3. Please continue to use and maintain the designated concrete washout, as well as the wheel-washing procedures that are currently in place.

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 Storm Water Pollution Prevention Plan (SWP3), must be submitted to the Ohio EPA **no later than July 22, 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: Thomas Sheridan, Engineer, City of Hudson  
Jeff Shiray, MS4 Program Manager, City of Hudson  
Ed Ratchford, Construction Inspector, City of Hudson  
William Currin, Mayor, City of Hudson  
Cindy Fink, Summit SWCD  
Osborn Engineering

ec: Phil Rhodes, Ohio EPA, NEDO, DSW

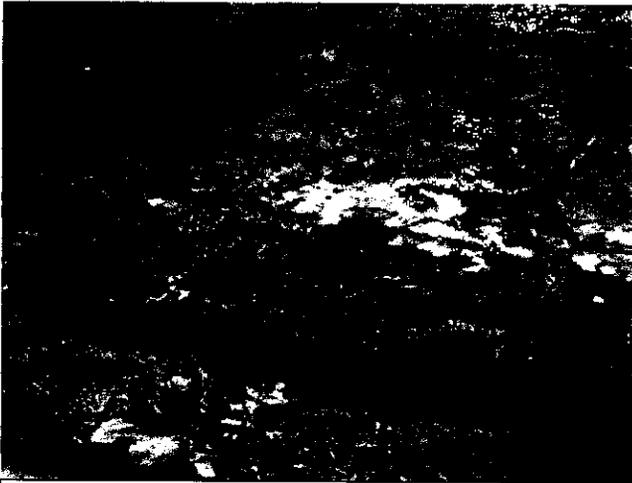


Figure 1 – Silt fence is missing.



Figure 2 – Adjacent pieces of silt fence are not connected properly.

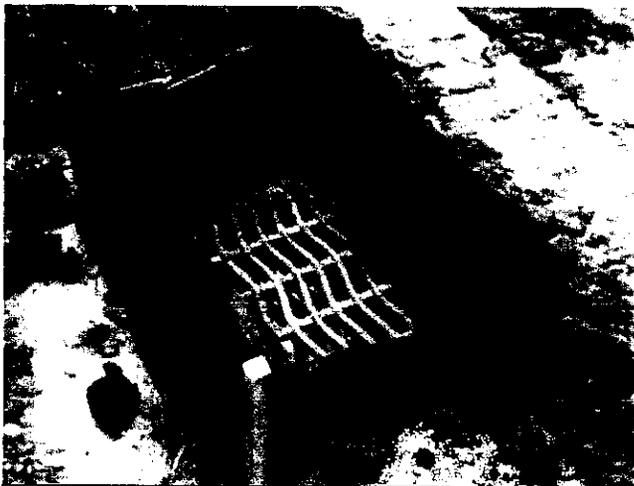


Figure 3 – The current inlet protection is not built per the NPDES requirements.



Figure 4 – Sediment has collected on the grate of the storm drain.