



**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 CROSSING PROJECT APPLE
CONSTRUCTION STORM WATER

Mr. Jerry Gruszewski
Premier Development Partners
5301 Grant Avenue Suite 100
Cleveland Heights, OH 44125

Dear Mr. Gruszewski:

On June 22, 2011, I, along with Cindy Fink of 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 #3GC04941*AG. While on site, I spoke with the project superintendent, Jeff Kowza of Premier Development Partners. Our records indicate that Premier Development Partners was granted coverage under the NPDES permit on May 26, 2010.

During my inspection, I documented the following deficiencies:

1. Runoff from the disturbed part of the property, as well as sediment-laden water from Site 200, is flowing through the culvert under the rock construction entrance and then leaving the site without being treated (Figure 1). The rock check dams that are currently in place along this drainage path are only meant to slow the velocity of the runoff and are not appropriate structures for treating the sediment-laden water (Figure 2). Please install a diversion along the south edge of the property to carry this water from the culvert to the sediment basin in the southeast corner of the site, where it will be properly treated. In addition, please consult with the project engineer to ensure that the sediment basin was designed to hold this added volume. If the basin cannot treat this water, you must construct a separate sediment control on Site 200 to ensure that the runoff is treated properly.
2. Off-site tracking of sediment is occurring on Hudson Crossing Parkway. Please install and maintain rock construction entrances where needed to prevent sediment from collecting on the street. Good housekeeping practices, such as street sweeping, may also be appropriate.
3. In all areas where earth-moving activities will not occur within 21 days, you must temporarily stabilize the dirt within seven days of the last earth disturbance.

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4. Based upon the grading of the site, the proposed post-construction extended detention pond will not treat all of the water discharged from the site, as required in the NPDES permit. Please reevaluate the post-construction best management practices (BMPs) for the site and determine if an additional post-construction structure is needed near the road to treat runoff from the front of the property or if this runoff can be diverted to an existing post-construction BMP.

Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your response, along with a copy of the Storm Water Pollution Prevention Plan (SWP3) for the site, must be submitted to the Ohio EPA **no later than July 21, 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. 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
Don Bierut, Chagrin Valley Engineering

ec: Phil Rhodes, Ohio EPA, NEDO, DSW



Figure 1 – The culvert under the construction drive is diverting sediment-laden water offsite.



Figure 2 – A rock check dam is being used as a sediment control practice, which is not acceptable.