Ohio | Environmental Protection Agency

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

July 11, 2011

RE: SUMMIT COUNTY
CITY OF TALLMADGE
WOODRIDGE PLANNED
RESIDENTIAL DEVELOPMENT
CONSTRUCTION STORM WATER

Mr. Dave Kolar
Cambridge Service Company
130 West Streetsboro Street Suite 4
Hudson, OH 44236

Dear Mr. Kolar:

On June 23, 2011, I, along with Dan Bogoevski of the Ohio EPA and 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 #3GC04069*AG. Our records indicate that Cambridge Service Company was granted coverage under the NPDES permit on July 24, 2008.

During my inspection, I documented the following compliance issues related to the NPDES permit:

1. I observed what appears to be an unauthorized fill of a stream channel. A large section of the stream that runs through the middle of the property has been redirected to one of the sediment basins (Figure 1). According to Summit SWCD, this stream fill was not authorized by a Section 404 permit or Section 401 water quality certification. **Per Part III.G.2.f of the NPDES permit, you are directed to contact the United States Army Corps of Engineers and the Ohio EPA Section 401 program to determine an appropriate course of action to address this apparent violation.** Please contact Alan Sisselman of the Army Corps of Engineers at (716) 879-4329 and Joe Loucek of the Ohio EPA Section 401 Program at (330) 963-1258.

   Furthermore, please be aware that by directing the flow from this culverted stream to the sediment basin, the basin is taking in a larger drainage area than intended by the original design contained in the Storm Water Pollution Prevention Plan (SWP3). You must either redirect the flow of this stream away from the sediment basin or redesign and rebuild the sediment basin to account for this additional drainage area.

2. The sediment basins need maintenance. Sediment has collected within them as intended, but they need to be dredged to restore sediment storage capacity. Please dredge as needed to reestablish the required sediment-storage volume (Figure 2). Dredging must be conducted with care to prevent unintended discharges of sediment during the process. Place dredged material upland from the sediment basin so that the dewatering of the spoils flows back to the sediment basin.

3. Please ensure that the riser pipes for the basins are designed according to the current specifications required by the NPDES permit and outlined 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. Riser pipes should dewater the dewatering volume in no less than 48 hours. In addition, the riser pipe for the sediment basin closest to I-76 has started to pull away from the outlet structure and needs to be reattached.

4. It is our understanding that the sediment basins will become permanent post-construction water quality ponds once the site is developed. For permanent ponds which discharge to natural wetlands, the NPDES permit requires the installation of level spreaders between the pond outlet and the wetlands. Level spreaders act to diffuse flow and protect the natural hydrology of wetlands. No level spreader is present at the discharge outlet of the largest pond (Figure 3). Because this discharge flows directly into a wetland, you must install a level spreader.

5. It appears that some runoff is bypassing the sediment basins and flowing into the neighboring wetland without being treated. This is a violation of the NPDES permit, which requires that all construction site runoff be treated by an appropriate control practice before being discharged to a water of the state. Please install diversions as needed to direct this runoff into the appropriate sediment basin, as intended by the SWP3.

6. Although much of the site has been seeded and some vegetation has been established, current grading patterns have created slope lengths that are too long to be stabilized with vegetation alone (Figure 4). As a result, significant erosion gullies have formed throughout the property (Figure 5). Vegetation can typically control no more than 150 feet of slope length when runoff is generated from unpaved surfaces and 75 feet when surfaces are paved. Please repair erosion gullies and take appropriate action to prevent or minimize their formation in the future. This may include re-grading the diversions to reduce slope lengths, installing erosion control matting and rock check dams within conveyance channels, or installing stable conveyance systems such as catch basins and storm sewer piping.

7. The silt fence has not been trenched six inches into the ground and backfilled in some areas, particularly along wetlands (Figure 6). Please properly install the silt fence so that it can effectively treat sediment-laden runoff.

8. A detention basin has been constructed for post-construction storm water management by building a dam across a wetland, as permitted by the Army Corps of Engineers. However, sediment is currently accumulating in this basin (Figure 7). According to Summit SWCD records, neither they nor the Army Corps of Engineers have granted Cambridge Service Company approval to use this structure as a sediment control during construction. If you have documentation that states otherwise, please submit it to the Ohio EPA. If not, you must stop using the post-construction pond as a sediment control practice and divert all runoff to other sediment controls immediately.

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 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. 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

Michelle Hummel
Assistant to the District Engineer
Division of Surface Water

MH/mt

cc: Robert O'Bryan, MS4 Program Manager, City of Tallmadge
David Kline, Mayor, City of Tallmadge
Cindy Fink, Summit SWCD
Alan Sisselman, Buffalo District, Army Corps of Engineers

ec: Phil Rhodes, Ohio EPA, NEDO, DSW
Joe Loucek, Ohio EPA, NEDO, DSW

Woodridge Planned Residential Development
City of Tallmadge Summit County

Photos Taken: June 23, 2011
By: Michelle Hummel, DSW, NEDO

Figure 1 – The stream has been redirected and is flowing across bare soil.

Figure 2 – Sediment has collected in the largest sediment basin.

Figure 3 – No level spreader is present at the outlet to the largest sediment basin.

Figure 4 – The entire site lacks stabilization.

Figure 5 – Erosion channels have formed along the banks of the sediment basins.

Figure 6 – The silt fence is not properly trenched and backfilled.

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Figure 7 – The wetland is currently being used as a sediment control.