



Environmental
Protection Agency

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

April 19, 2011

RE: WAYNE COUNTY
CITY OF ORRVILLE
BLACKBERRY FARM
CONSTRUCTION STORM WATER

Mr. Ken Weaver
Weaver Custom Homes Inc.
2171-A Eagle Pass
Wooster, OH 44691

Dear Mr. Weaver:

On March 21, 2011, I visited the above referenced site in response to a citizen complaint. I was accompanied by Ron Cross, Engineering Technician and Streets Superintendent for the City of Orrville, and Lynn Snyder, City Engineer. The complainant contacted Ohio EPA after the homes on Viking Avenue experienced flood conditions after a heavy rain and concurrent snowmelt. The complainant expressed concerns that the storm water management structures at the Blackberry Farm site are either not designed properly or not being maintained. Our records indicate that Weaver Custom Homes Inc has obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC02563*AG.

The City indicates that construction activities at the Blackberry Farms site are sporadic and that there have been no major activities there in some time, other than soil removal from stockpiles. There were no home starts in all of 2010. Runoff from the portion of Blackberry Farms that has been disturbed by construction activity drains to either the two-celled North Basin in the NE corner of the site or the South Basin located in the SW corner. Discharges from the South Basin are directed toward Viking Avenue via a storm sewer system. I noted the following compliance issues related to the NPDES permit:

- Much of the drainage area to the South Basin is bare and is not temporarily stabilized as required by the NPDES permit. Part III.G.2.b.i of the NPDES permit requires Weaver Custom Homes Inc to initiate temporary stabilization of disturbed soils within 7 days of the most recent disturbance if they are to remain idle for 21 days or longer. Based on my observations and the indications made by the City of Orrville, it appears that the majority of the site south of Building 17 requires temporary stabilization. This will reduce the amount of sediment flowing to the West Detention Basin and subsequently to the storm sewer system beyond. Discharges of sediment to the storm sewer system can reduce its capacity to convey larger storm events.
- Before construction within the drainage area to the South Basin resumes, the West Basin must be modified to act as a sediment basin. The Storm Water Pollution Prevention Plan (SWP3) in our files shows a 6-inch perforated dewatering pipe attached to the outlet structure. The dewatering pipe was not visible on the date of inspection, and if installed, likely requires maintenance. Further, be aware that the dewatering pipe should be end-capped such that all flow is through the gravel, geotextile and pipe perforations. Then, once construction activities within the drainage area of the West Basin are substantially completed, the dewatering pipe is to be removed and the

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

Mr. Ken Weaver
Blackberry Farm
April 19, 2011
Page 2

permanent basin outlet is to be 1.25-inch diameter orifice surrounded by a trash rack to reduce clogging. See enclosure.

NOTE: The sediment basin outlet depicted in your SWP3 for the South Basin does not meet current design standards. Rather than implementing the design in the SWP3, you may also implement a basin designed to current standards. This would entail either a floating skimmer or riser pipe designed to drain the dewatering volume in 48 hours or longer (see enclosure). These structures may be easier to maintain than the planned dewatering pipe. Please review your options with the project engineer and, if necessary, amend the SWP3 to reflect any change in design.

- The rock construction entrance (RCE) at the end of the current pavement on Blackberry Lane needs improvement. It has not been built to specifications contained in **Rainwater and Land Development** (Ohio Department of Natural Resources, 2006). The RCE is to consist of 2-inch diameter stone over geotextile. It is currently built with 1-inch diameter gravel and no geotextile. The stone and geotextile should extend at least 70 feet into the disturbed portion of the development.

In regards to the complainant's drainage concerns, the occurrence that spurred the complaint was related to an unusually heavy rainfall (2-to-3 inches) and concurrent rapid melting of a 10-inch snowpack. In addition, it appears that the homes along Viking Avenue may be receiving runoff from the farm field west of Blackberry Farms that was not intended to drain to them. As these issues are outside the scope of the Ohio EPA's NPDES permit, I do not plan to provide any further follow-up on the drainage aspects of the complaint. Any further questions should be directed to the City of Orrville.

Please provide me with a letter of response to the bullet-point items related to NPDES permit compliance. Please indicate the actions you will take to address those concerns including a timeframe by which to complete them. Your response should be received no later than May 2, 2011. Please be aware that failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07 and is punishable by fines.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/mt

cc: Steve Wheeler, Director of Public Service and Safety, City of Orrville
Ron Cross, Streets Superintendent, City of Orrville
Lynn Snyder, Engineer, City of Orrville

BLACKBERRY FARMS
Weaver Custom Homes Inc.
City of Orrville Wayne County

Photos Taken: March 21, 2011
By: Dan Bogoevski, DSW, NEDO

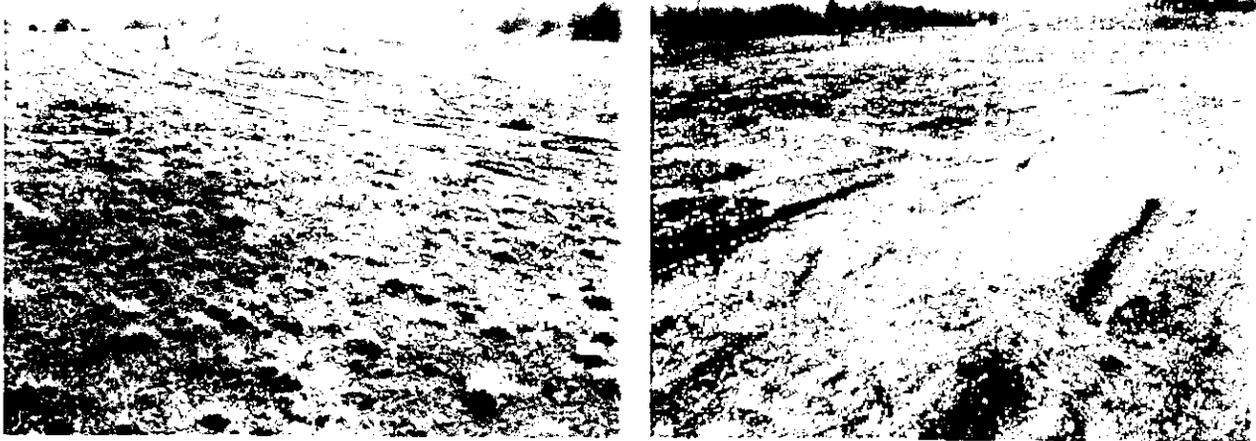


Fig 1 & 2. Although some dormant vegetation was observed in spots, the majority of the area yet to be developed is bare and in need of temporary stabilization. If areas are not expected to be re-disturbed for 1 year or longer, a permanent seeding should be applied.



Fig 3. The rock construction entrance at the end of Blackberry Lane has not been constructed per standard specifications. There is no geotextile and the stone size is too small.