



**Environmental
Protection Agency**

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

Re: Fulton County
Willow Run Subdivision
Construction
Storm Water

August 10, 2011

Mr. Timothy Smith
Swanton Properties Ltd.
8959 Airport Highway
Swanton, Ohio 43558

Dear Mr. Smith:

On June 28, 2011, I inspected Willow Run Subdivision North of Airport Highway, Swanton. The purpose of the visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with construction activity, Facility ID Nos. OHR105107 (phase 1,2,3) 2GC00412*AG (phase5) and 2GC00189*AG (phase 4). The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111.

At the time of inspection, there was no construction activity occurring. The roads and utilities are installed and phases 1, 2 and 3 are fully developed. Several lots in phase 4 have been developed and a few in phase 5. The remaining undeveloped lots (greater than 1 acre) are covered with grass.

It is not apparent what post-construction Best Management Practices (BMPs) are being used at this site. Since phases 4 and 5 have Construction General Permit coverage under OHC000002, there is a post-construction requirement that those two phases must comply with. Please be aware that the Storm Water Pollution Prevention Plan (SWP3) must contain a description of the post-construction BMPs that will be installed during construction, including detail drawings, and the rationale for their selection. The rationale must address the anticipated impacts on the receiving stream's channel and floodplain morphology, hydrology, and water quality. Maintenance plans shall be provided by the permittee to the post-construction operator upon completion of construction activities.

Phases 4 & 5 are greater than five acres, according to the NOIs, and are considered large construction sites. The post-construction BMP(s) must be sized to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards in Ohio Administrative Code 3745-1.

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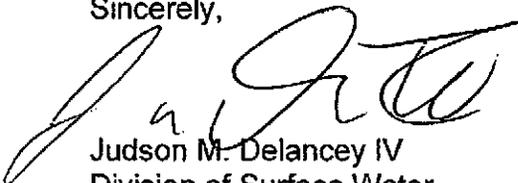
An additional volume equal to 20% of the WQv shall be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. Drain times shall meet those in Table 2 of the Permit. *This is a violation of Part III.G.2.e of the permit.*

When revising the SWP3, please show for each control: the calculations of the WQv, a detail drawing of the structure with relevant elevations, stage-storage tables, and release rate calculations. Offsite drainage must be included when sizing the structure. Runoff coefficients must be based on those contained in Table 1 of the permit. If a weighted runoff coefficient is being used, include supporting calculations. The SWP3 must address how the post-construction requirements will be met for all disturbed areas, including those not draining to the ponds. Additional guidance on Ohio EPA's Post Construction Storm Water Management requirements can be found in our online Q & A document at: <http://www.epa.ohio.gov/dsw/storm/CGP-PC-Q&A.htm>.

Please send written notification of what corrective measures you have taken as well as a copy of the site's SWP3 to this office within 10 days of the date on this letter. Your SWP3 must fulfill all of the requirements of *Part III.G* of your permit.

If there are any questions, please contact me at (419) 373-3036.

Sincerely,



Judson M. Delancey IV
Division of Surface Water
Storm Water Program

/llr

pc: DSW-NWDO File
Jon Gochenour, Village Administrator