



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

RE: Huron County
Redwood Village
Construction
Storm Water

August 11, 2009

Mr. David Conwill
Redwood Village
387 Medina Road, Suite 600
Medina, Ohio 44256

Dear Mr. Conwill:

On June 18, 2009, Lynette Hablitzel and I inspected Redwood Village located east of the Stower Lane cul-de-sac, Norwalk. 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 (Construction General Permit), Facility ID No. 2GC02094. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Ohio EPA has no record of other permittees for this site.

As a result of the inspection, I have the following comments:

1. At the time of the inspection, residential units 1A-2N, 7A-7N, and 14A-14N on the western side of the site were completed. Utilities, including storm sewers, had been installed to serve this area. Paving had been done. To the east of the units, it appeared that initial clearing and grading had been done.
2. Due to the absence of personnel or a construction trailer, the Storm Water Pollution Prevention Plans (SWP3) and inspection logs were not available for review.
3. A retention pond was located west of the buildings on the south side of the road. The pond is required to meet the design requirements for a sediment settling pond until construction activities have ended and a perennial vegetative cover of 70% density has been achieved over the entire tributary area. Without reviewing the SWP3, I am unable to determine if the pond meets the requirements of the permit. *Permit Requires:* Sediment settling ponds must meet the following criteria: a dewatering volume with a maximum depth of 5 ft., sized at 67 c.y. per drainage acre, and for drainage areas of 5 acres or more: a minimum 48 hour dewatering time; a sediment storage volume of 1000 c.f per disturbed acre provided below the dewatering zone; and at least a 2:1 length to width ratio between the nearest inlet and the outlet. *Please see Part III.G.2.d.ii. of the permit.* Please assess the retention pond and submit a written verification that it currently meets the design requirements of the permit for a sediment settling pond.



4. It appeared that straw bales and filter fabric had been used as inlet protection on a yard drain located southeast of the units. However, the drain was almost completely covered in sediment. What fabric that was visible was torn and the bales were no longer intact. No inlet protection was evident on the storm sewer inlets located in the middle of the street.

It should be noted that straw bales and/or wrapping a grate with a geotextile are not accepted methods of sediment control. All erosion and sediment control practices used to meet the conditions of this permit should meet the standards and specifications of the current edition of Ohio's *Rainwater and Land Development Manual* (ODNR) or other standards acceptable to Ohio EPA. *Please see Part III.G.2. of the permit.*

Permits Requires: Practices shall minimize sediment laden water entering active storm drain systems unless they drain to a sediment settling pond. *Please see Part III.G.2.d.iv. of the permit* At this time, I am unable to determine where the inlets drain to without reviewing the SWP3. If catch basins do not drain to the pond or the pond does not meet the design criteria for a sediment settling pond, it will be necessary to install inlet protection and maintain it until the upslope area reaches a 70 % density of vegetative cover.

5. For the eastern portion of the site, silt fence had been installed along the north, south and east sides, but there were some sections of the fence that had been knocked down or torn. *Permit Requires:* All control practices shall be maintained and repaired as needed to assure continued performance of their intended function. *This is a violation of Part III.G.2.h. of the permit.* Also, it appears that the drainage area behind this perimeter silt fence is larger than a half acre, which exceeds the permit requirements. *Permit Requires:* The maximum drainage area behind silt fence is:

Drainage Area for 100 Lineal Ft. of Silt Fence	Range of Slope
0.5 acres	<2%
0.25 acres	≥2% but <20%
0.125 acres	≥20% but <50%

Where the above criteria is exceeded, a diversion which directs runoff to a sediment settling pond is required. *This is a violation of Parts III.G.2.d.ii. and iii. of the permit.*

6. The east side of the site was inactive and bare. Soil stockpiles in the middle and south portions of the east side had weed growth. It appears that the timeframes for applying soil stabilization have been exceeded. *Permit Requires:* Portions of the construction site which will be inactive for more than 21 days must have temporary stabilization initiated within the first seven. Temporary stabilization is required prior to the onset of winter weather for ground that will be idle over winter.

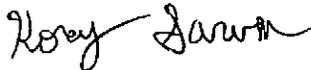
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Permanent stabilization is required within 7 days on any portion of the site that has reached final grade or will be idle for longer than 1 year. Soil stabilization practices shall be initiated within two (2) days on inactive, barren areas within 50 feet of a stream.

Permanent seeding and mulching is required before construction activity is completed throughout the entire site. If seasonal conditions prohibit the establishment of vegetative cover, other means, such as mulching and matting, must still be used and maintained until more permanent methods can be implemented. *Failure to do so is a violation of Part III.G.2.b.i. of the permit.* At a minimum, temporary stabilization must be applied to all bare idle areas. To the west of the buildings there were two retention ponds. The southern retention pond appears to serve the development. Its banks had some grass growth, but rills were present and growth had not reached a 70% density. It may be necessary to reseed some areas. There was a gully forming on the southeast bank of the northern pond. If this pond is part of the total common plan of development for Redwood Village, its banks must be stabilized.

Within 10 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to prevent any future violations. Your response should include the dates, either actual or proposed, for the completion of the actions. If there are any questions, please contact me at (419) 373-3085.

Sincerely,



Korey Sarven
Division of Surface Water

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pc: ~~NWDO file~~

Josh Snyder, Public Works Director, City of Norwalk, Norwalk City Hall