



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 21, 2012

RE: LORAIN COUNTY
CITY OF AVON
LOR-90-22.26
CONSTRUCTION STORM WATER
3GC05376*AG

Mr. Perry Ricciardi
ODOT District 3
906 E. Clark St.
Ashland, OH 44805

Mr. Michael Prenatt and Mr. Greg Schafer
Underground Utilities Inc.
416 West Monroe Street
Monroeville, OH 44847

Mr. Jorge Baez
Mosser Construction Inc.
122 S Wilson Avenue
Drawer D
Fremont, OH 43420

Dear Mr. Ricciardi, Mr. Prenatt, Mr. Baez, and Mr. Schafer:

On May 31, 2012, Dan Bogoevski and I performed a compliance inspection for storm water best management practices (BMPs) at the above referenced site. We were accompanied by Rob Knopf, Engineer for the City of Avon. While on site, we met with Luke Wysocki, Project Engineer for ODOT District 3. Our records indicate that the City of Avon Sanitary and Water Line Addition has obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05376*AG.

After review of the site and Storm Water Pollution Prevention Plan (SWP3), I noted that temporary stabilization, silt fence, and check dams had largely been implemented per the plan, however, additional practices appear to be required to comply with the NPDES permit. In particular, areas of concentrated flow of where drainage areas exceed the capacity of silt fence must be controlled with a sediment trap or basin. Check dams do not substitute for sediment ponds. My inspection of the site revealed the following:

1. Sediment ponds need to be installed within the drainage channels along Ramp 1 at their outlets to Heider Ditch at both the east and west sides of Heider Ditch. The drainage area is too large for just a silt fence and rock check dam.

2. Ramp 4 at Nagle Road Bridge needs a sediment pond. The drainage area is too large for existing silt fence. Drainage from the north side of the ramp breaks toward a drainage channel. Silt fence needs to be installed along the length of the drainage channel on the north side of the ramp.
3. There are several other drainage locations that currently need a sediment trap or will need one as construction progresses. The drainage area at these locations is too large for a silt fence alone:
 - a. Ramp 1 at the Nagle Road bridge abutment.
 - b. At the end of Ramp 2 at Heider Ditch.
 - c. At the ends of Ramp 3 and Nagle Road ditch before the culvert.
 - d. At the east end of Ramp 3 at the end of the acceleration lane at the culvert prior to the jurisdictional stream.
 - e. On each side of the jurisdictional stream on Avon Road
 - f. At DC-27, instead of the ditch check currently in place.
4. A concrete washout pit is needed. The trucks are just being washed out onto the ground right now.
5. There needs to be inlet protection on IP-27, 29, 30, and 31 before they are in service. Dandy Bags have been used inappropriately to construct IP-32. Please replace with an appropriately constructed inlet protection.
6. FF-20 needs repair. It also needs to be backfilled. Where the two rolls of silt fence must be joined, the stakes need to be twisted together before they are staked into the ground.
7. FF-1 on sheet 5 of the Storm Water Pollution Prevention Plan (SWP3) needs to be trenched and backfilled, since currently water can flow right under it. The stakes at the joints need to be twisted together as well.
8. FF-36 needs the joint stakes twisted together. FF-36A has a section that was put in backwards. This needs to be fixed. The section between these two silt fences is at final grade and is due for permanent stabilization. Matting should be used. The rock check dams were not built correctly; they need to be saddle shaped.
9. A silt fence is needed at the northeast corner of Nagle Road and Just Imagine Drive along the temporary road.
10. Exfiltration trenches have been installed on Nagle Road north of the Cleveland Clinic Building for post-construction control. But, the top layer of permeable concrete does not appear to meet specifications. The concrete is not flush with the roadway surface and the aggregate is loose and not bound. These exfiltration trenches may need to be rebuilt before the project is accepted.

Please provide me with a letter of response indicating the actions that you have taken or will take to address the deficiencies noted above. Include any amendments to the SWP3 with your response. Your response must be received no later than **July 6, 2012**. 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) 963-1125 or by e-mail at Katie.Bowman@epa.state.oh.us

Sincerely,



Katie Bowman
Assistant to the District Engineer
Division of Surface Water

KB/cs

cc: Rob Knopf, Engineer, City of Avon
Luke Wysocki, Project Engineer, ODOT District 3
Jim Smith, Mayor, City of Avon

ec: Ron Trivisonno, ODOT Central Office

Attachments: Photos

INSPECTION PHOTOS

LOR-90-22.26



Figure 1 & 2: Ramp 1, Heider Ditch Drainage Area



Figure 3 & 4: Ramp 1, east end at Nagle Road Structure



Figure 5: Ramp 3



Figure 6: Ramp 4



Figure 7: Current concrete washout pit, north side of Chester, west side of Nagle



Figure 8: Temporary Road, looking East



Figure 9 & 10: FF-1; gap underneath fence, gap between stakes



Figure 11 & 12: Ramp 1, east end at Nagle Road Structure



Figure 13 & 14: Ramp 1, east end at Nagle Road Structure



Figure 7: Two curb Beaver Dam inlet protections on IP-32



Figure 8: Exfiltration trench

City of Avon, Lorain County
Photos taken on May 31, 2012
Photos taken by Katie Bowman, DSW