



**Environmental
Protection Agency**

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

June 26, 2012

RE: CUYAHOGA COUNTY
CITY OF SOLON
ANCHOR INDUSTRIES INC
CONSTRUCTION STORM WATER

Mr. Doug Kaufman
Geis Companies
10020 Aurora-Hudson Road
Streetsburo, OH 44241

Dear Mr. Kaufman

On June 6, 2012, I performed a compliance inspection for storm water best management practices (BMPs) at the above referenced site. While on site, I met with Carl Vasil, Superintendent of the site. Our records indicate that the Geis Companies have obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05880*AG.

After review of the site and Storm Water Pollution Prevention Plan (SWP3), I noted the following deficiencies in BMP implementation:

1. The dumpster's door does not seal shut. This may result in the discharge of pollutants due to leaks. Further, dumpsters should be covered and checked for holes when received. Replace dumpsters if they are not in good condition.
2. The construction entrance was not clearly defined. The asphalt roads were covered in sediment that had been tracked from the site. The entrance needs to be a rock construction entrance (RCE) as shown in the *Rainwater and Land Development* manual (see enclosed specification for RCEs). Good housekeeping is required to address off-site tracking.
3. The silt fence along the site was not backfilled, which caused bulging of the fence and holes to form underneath. The joints of the fence need to be connected by twisting the stakes together before staking them into the ground, not overlapping them.
4. The outfall from the basin does not appear to have geotextile fabric underneath the rock rip rap. See the enclosed specification for rock outlet protection.
5. A tree has fallen on the southeast corner of the silt fence. This area is crucial since most of the water collects there. Please remove the tree and repair the silt fence.
6. A little farther down the fence are sticks being used as stakes. These are not holding up the fence correctly. Please use appropriate staking for silt fence.
7. There is currently a pile of dirt in the middle of the site. There was no mention of a stock pile in the plans. If this is being kept as a stock pile, the SWP3 needs to be amended to show this.
8. There is a petroleum tank on the site with no spill kit present. A spill kit should be on site at all times when there is fuel or other chemicals on site.
9. There are piles of soil on the northwest part of the site. These are not being protected by silt fences and sediment is going into the road. There are two catch basins on this road

that all the sediment is running to. These do not have any inlet protection. A silt fence should be installed to stop this from happening.

10. Concentrated runoff is occurring in the NW corner of the property. Mr. Vasil indicated that the contributing slope will be re-stabilized during the week of June 11-15. If this has not yet occurred, a sediment trap may need to replace the existing silt fence. Silt fence is not appropriate to control concentrated storm water runoff. These areas are show in the pictures below.
11. If areas disturbed by construction activity will not be reworked within 21 days of the last date they were disturbed, the NPDES permit requires temporary stabilization to be initiated within seven days of last disturbance. There appear to be areas of the site where temporary stabilization is appropriate.

You are directed to 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 11, 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 email at Katie.Bowman@epa.state.oh.us

Sincerely,



Katie Bowman
Assistant to the District Engineer
Division of Surface Water

KB/cs

cc: Carl Vasil, Project Manager, Geis Construction
Todd Houser, Storm Water Program Manager, Cuyahoga County
Susan A. Drucker, Mayor, City of Solon

Attachments: Photos, Rainwater and Land Development manual pages

INSPECTION PHOTOS

Anchor Industries Inc



Figure 1: Garbage bin not covered and door not sealed



Figure 2: A rock construction entrance has not been provided as indicated in the SWP3

Figure 3: Pile of dirt on the northwest side of the side. Sediment covering paved road



Figures 4&5: Silt fence joints not properly twisted together. Dirt piled up next to it leaving little ability for runoff to pond up against the fence and seep through the fabric



Figure 6: Outlet from the sediment basin onto the large mound on the west side.
Figure 7: Tree has fallen on the silt fence. This is where most of the water ponds.



Figures 8&9: Silt fence falling over. Not backfilled. Sticks being used as stakes.



Figure 10: Large Oil Tank with no spill kit. Middle of the north side.



Figure 11: Construction entrance with berm on the north side next to the parking lot.
Figure 12: Parking lot catch basin with sediment flowing in.



Figure 13: Pile of soil along Solon Industrial Blvd.
Figure 14: Sediment from the above pile draining into the road's storm sewer.



Figure 15: Area one on the south side of the property. A small silt fence is trying to block a ditch's concentrated flow.
Figure 16: Area two on the east side of the property. Flow is being concentrated before reaching the silt fence below.