



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 5, 2012

RE: CUYAHOGA COUNTY
CITY OF CLEVELAND
PORT OF CLEVELAND
CONSTRUCTION STORM WATER
PERMIT NO: 3GC05858

Mr. Matt Welsh
Cleveland-Cuyahoga County Port Authority
1475 East 9th Street, Suite 2300
Cleveland, OH 44114

Mr. Ryan Simon
Great Lakes Construction Company
2608 Great Lakes Way
Hinckley, OH 44233

Dear Mr. Welsh and Mr. Simon:

On June 20, 2012, I performed a compliance inspection for storm water best management practices (BMPs) at the above referenced site. While on site I met with Patrick Garber, Port Millwright. Our records indicate that the Cleveland-Cuyahoga County Port Authority and the Great Lakes Construction Company have obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05858*AG.

After review of the site and Storm Water Pollution Prevention Plan (SWP3), my inspection of the site revealed the following deficiencies of the NPDES:

1. Your SWP3 does not give detail for inlet protection on catch basins within paved areas. Silt socks are not approved as catch basin inlet protection. The plan needs to be amended to show proper pavement inlet protection and this protection needs to be installed on site; it is needed where there is sediment runoff from the construction.
2. The yard inlets need to be kept clean. Sediment should not be running into the catch basins from within the silt fence box. A small amount of gravel can be used to cover the soil within this area.
3. The joints of the silt fence where two ends meet need to have the stakes twisted together.
4. Review the construction site on a weekly basis and determine if any areas require temporary stabilization between construction operations. Temporary stabilization can be achieved by seeding and mulching, or just applying mulch, depending on the time of year. The NPDES permit requires temporary stabilization to be initiated within seven days of last disturbance on any disturbed area that will remain idle for 21 days or longer. You must keep a log of grading and stabilization activities to document compliance with this permit condition.

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5. Please identify the post-construction runoff control practices that will be installed for this project. Please be aware that alternative post-construction BMPs on large construction activity must get prior approval from Ohio EPA. Alternative post-construction BMPs include any practice not contained in Table 2 in Part III.G.2.3 of the NPDES permit.

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 19, 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: Lisa Vavro, Cuyahoga SWCD
David Cooper, Department of Building and Housing, City of
Rachid Zoghaib, Department of Water Pollution Control, City of Cleveland
Frank G. Jackson, Mayor, City of Cleveland

Attachments: Photos

INSPECTION PHOTOS

Port of Cleveland



Figure 1: Filter/compost sock around paved inlet



Figure 2: Soil within yard inlet protection



Figure 3: Silt fence along edge of site

City of Cleveland, Cuyahoga County
Photos taken on June 20, 2012
Photos taken by Katie Bowman, DSW