



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 19, 2012

RE: LORAIN COUNTY
CITY OF AVON
RICHARD E JACOBS FAMILY HEALTH CENTER
CONSTRUCTION STORM WATER
PERMIT NO: 3GC04676

Mr. Dave Doren
Cleveland Clinic Office of Construction
9500 Euclid Avenue- CC4
Cleveland, OH 44195

Mr. Raymond Kinney
SiteTech Inc
35710 East Royalton Road
Grafton, OH 44044

Mr. Timothy J Carter
Donleys Inc
5430 Warner Road
Cleveland, OH 44125

Dear Mr. Doren, Mr. Kinney, and Mr. Carter:

On July 2, 2012, I performed a compliance inspection for storm water best management practices (BMPs) at the above referenced site. I was accompanied by Rob Knopf, Engineer for the City of Avon; and Tom Hardwick, Inspector with Bramhall Engineering and Surveying Company. Our records indicate that the Cleveland Clinic Office of Construction has obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC04676*AG.

After review of the site, I noted that a retention pond and silt fencing had been implemented per the plan, however, maintenance on these sediment and erosion controls needs to be done to comply with the NPDES permit. My inspection of the site revealed the following:

1. Silt fence must be maintained throughout construction. There are several locations where the silt fence has fallen down. Also, the joint stakes of the fence must be twisted together prior to staking. Dirt must be kept away from the silt fence to create a buffer where water can pond. Please retighten the silt fence, fix the joints, and pull the dirt away from the fence.
2. 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 7 days of last disturbance. There appear to be areas of the site where temporary stabilization is appropriate; where dirt is up against the silt fence is one location where it may be necessary.
3. There is a fuel storage tank on site that is double walled. There was spilled oil on the ground where the nozzle is located. Contaminated soil must be disposed of immediately

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into a solid waste dumpster. If the leaking continues, a drip pan should be placed underneath this area, or repairs to the container need to occur.

4. The retention basin is installed and is functioning properly. However, access to the point of discharge to the stream was not apparent. As part of the NPDES permit, post-construction BMPs must be up-kept throughout its lifetime. Access to this point of discharge is necessary to comply with the obligations of the NPDES permit.
5. There is trash in the retention basin. This area, as well as the area of construction, should be kept clean and free of debris. Please dispose of this trash properly.

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 August 2, 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:bo

Attachments: Photos

pc: Rob Knopf, Engineer, City of Avon
Greg Masson, Building Inspector, City of Avon
Jim Smith, Mayor, City of Avon

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MR. RAYMOND KINNEY
MR. TIMOTHY J. CARTER
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INSPECTION PHOTOS
Richard E Jacobs Family Health Center



Figure 1: Silt fence has fallen down



Figure 2: Joint stakes not twisted together prior to staking



Figure 3: Dirt pushed up against silt fence. Area where temporary stabilization may need to occur



Figures 4&5: Fuel containment with an oil spill under the hose nozzle.

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MR. RAYMOND KINNEY
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Figure 6: Fence blocking access to outlet of retention pond.

Figure 7: Trash in retention pond.

City of Avon, Lorain County
Photos taken on July 2, 2012
Photos taken by Katie Bowman, DSW