



**Environmental  
Protection Agency**

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

August 27, 2012

RE: HOLMES COUNTY  
MILLER-HOPE CONDOMINIUM DEVELOPMENT  
NPDES PERMIT NO. OHC000003  
OHIO EPA PERMIT NO. 3GC05169\*AG  
STORM WATER POLLUTION PREVENTION PLAN REVIEW

Harry Matter, President  
Civil Design Associates  
1760 Brightwood Rd. S.E.  
New Philadelphia, OH 44663

Dear Mr. Matter:

On August 9, 2012, Ohio EPA received a copy of the storm water pollution prevention plan for the at Miller-Hope Condominium Development aka the Cove, located at 4870 Township Road 403, Walnut Creek Township, Holmes County (site). After a review of the Storm Water Pollution Prevention Plan (SWP3), the following deficiencies must be addressed via the submittal of a revised SWP3:

- Part III.G.1.b of the General Storm Water Permit requires the total area of the site and the area of the site that is expected to be disturbed. The SWP3 does not include this information.
- Part III.G.1.c of the General Storm Water Permit requires an estimate of the impervious area and percent imperviousness created by the construction activity. The SWP3 does not include this information.
- Part III.G.1.d of the General Storm Water Permit requires a calculation of the runoff coefficients for both the pre-construction and post construction site conditions. The SWP3 does not include this information.
- Part III.G.1.e of the General Storm Water Permit requires existing data describing the soil. The SWP3 does not include this information.
- Part III.G.1.f of the General Storm Water Permit requires a description of prior land uses at the site. The SWP3 does not include this information.
- Part III.G.1.g of the General Storm Water Permit requires an implementation schedule, which describes the sequence of major construction operations (i.e., grubbing, excavating, grading, utilities and infrastructure installation) and the implementation of erosion, sediment and storm water management practices or facilities to be employed during each operation of the sequence. The SWP3 does not include this information.
- Part III.G.1.h of the General Storm Water Permit requires the name and/or location of the immediate receiving stream or surface water(s) and the first subsequent named receiving water(s) and the areal extent and description of wetlands or other special aquatic sites at or near the site which will be disturbed or which will receive discharges from disturbed areas of the project. The SWP3 does not include this information.

- Part III.G.1.l of the General Storm Water Permit requires a cover page or title identifying the name and location of the site, the name and contact information of all construction site operators, the name and contact information for the person responsible for authorizing and amending the SWP3, preparation date, and the estimated dates that construction will start and be complete. The SWP3 does not include this information.
- Part III.G.1.m of the General Storm Water Permit requires a log documenting grading and stabilization activities as well as amendments to the SWP3, which occur after construction activities commence. The SWP3 does not include this information.
- Part III.G.1.n of the General Storm Water Permit requires a site map that includes the following:
  - i. Sediment and storm water management basins noting their sediment settling volume and contributing drainage area;
  - ii. Areas designated for the storage or disposal of solid, sanitary and toxic wastes, including dumpster areas, areas designated for cement truck washout, and vehicle fueling; and
  - iii. The location of designated construction entrances where the vehicles will access the construction site.
- Part III.G.2.b.i of the General Storm Water Permit requires temporary stabilization to occur within seven days of last disturbance or two days of the last disturbance if located within fifty feet of "waters of the State" if an area of the site is to remain idle for twenty-one days or longer. Sheet No. 24 does not include the correct temporary stabilization language.
- Part III.G.2.d.ii of the General Storm Water Permit requires sediment settling pond to be used for any one of the following conditions:
  - i. Concentrated storm water runoff (e.g., storm sewer or ditch); and
  - ii. Runoff from drainage areas, which exceed the design capacity of silt fence or other sediment barriers.

The SWP3 depicts silt fence to be utilized in portions of the site where the above two conditions exist. Sediment settling ponds are required to be utilized.

- The sediment settling pond depicted on the SWP3 has not been designed to include an outlet structure (i.e. dewatering skimmer, etc.) that has been properly designed for sediment removal during construction.
- Part III.G.2.d.ii of the General Storm Water Permit requires that the sediment settling pond volume consists of both a dewatering zone and a sediment storage zone. The volume of the dewatering zone shall be a minimum of 1800 cubic feet (ft<sup>3</sup>) per acre of drainage (67 yd<sup>3</sup>/acre) with a minimum 48-hour drain time for sediment basins serving a drainage area over five acres. The volume of the sediment storage zone shall be calculated by one of the following methods: Method 1: The volume of the sediment storage zone shall be 1000 ft<sup>3</sup> per disturbed acre within the watershed of the basin. OR Method 2: The volume of the sediment storage zone shall be the volume necessary to store the sediment as calculated with RUSLE or a similar generally accepted erosion prediction model. The SWP3 does not include this information.
- Part III.G.2.e of the General Storm Water Permit requires post-construction storm water practices to provide perpetual management of runoff quality and quantity. Structural (designed)

post-construction storm water treatment practices shall be incorporated into the permanent drainage system for the site. The SWP3 does not depict post-construction storm water management practices for the portion of the street's storm sewer system that discharges directly into the onsite stream. In addition, the onsite detention basin does not appear to have been designed in accordance with the design standards established for post-construction storm water management (i.e. water quality volume, draindown times, etc). Post-construction storm water management practices must be designed for the site.

- Part III.G.2.e of the General Storm Water Permit requires a post construction operation and maintenance (O&M) plan must be a stand-alone document, which contains: (1) a designated entity for storm water inspection and maintenance responsibilities; (2) the routine and non-routine maintenance tasks to be undertaken; (3) a schedule for inspection and maintenance; (4) any necessary legally binding maintenance easements and agreements; and (5) a map showing all access and maintenance easements.

This correspondence serves to inform you that the site's SWP3 is deficient and must be revised to include the above items. A copy of the revised SWP3, post-construction storm water management practices design calculations, and the O&M plan must be submitted to my attention within ten days of receiving this correspondence. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1118 or via e-mail at [chris.moody@epa.ohio.gov](mailto:chris.moody@epa.ohio.gov).

Sincerely,



Chris Moody  
Environmental Specialist II  
Division of Surface Water

CM/cs

cc: Willis Schlabach  
Roy Miller, Miller-Hope Development Co., LLC