



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

December 18, 2012

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

Roy Miller
Miller-Hope Development Co., LLC
5156 S Kohler Road
Apple Creek, OH 44606

Bill Mullet, CEO
ProVia
2150 State Route 39
Sugarcreek, OH 44681

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

Dear Mr. Miller, et al:

On December 10, 2012, Ohio EPA received a copy of the revised Storm Water Pollution Prevention Plan (SWP3). After a review of the SWP3, the following post-construction storm water management deficiencies must be addressed via the submittal of a revised SWP3:

- The storm sewer system serving "Out Lot 21" proposes to utilize a "4' filtering manhole with rock channel protection." This will not satisfy the General Storm Water Permit as the requirements for post-construction storm water management address both pollutant removal and hydrologic impacts to the receiving stream by establishing specific drain down times for the structural post-construction best management practices (BMP) that have been authorized in Table 2. While Part III.G.2.e of the General Storm Water Permit does allow Ohio EPA to approve alternative post-construction BMPs, the proposed BMP cannot be approved as an alternative post-construction BMP since it has not been tested utilizing the protocols established via the Technology Acceptance Reciprocity Partnership's Protocol for Stormwater Best Management Practice Demonstrations. In addition, the proposed BMP has not been sized to capture and treat the water quality volume (WQv) and fails to address the hydrologic impact aspect.
- A BMP similar to "Out lot 21," detailed above, has been proposed for "Out Lot 12." For the same reason as provide above, Ohio EPA cannot approve the proposed BMP as an alternative post-construction BMP.

- The current design of the detention basin does not appear to satisfy Part III.G.2.e of the General Storm Water Permit. Specifically, storm water runoff entering the storm sewer system appears to be directed to the detention basin and will only enter the detention basin during high storm events, which will cause the water to back up into the detention basin. Storm water, during most storm events, will bypass the detention basin via a buried "36" perforated pe pipe", which discharges into a possible onsite stream that has been culverted.

The detention basin must be redesigned in order to satisfy the General Storm Water Permit. This may involve the removal of the "36" perforated pe pipe," which will allow storm water to enter the detention basin. In addition, the detention basin must be modified for extended detention based upon the WQv and incorporate an appropriately sized forebay and micropool. The extended detention basin's outlet structure may also have to modified (i.e. appropriately sized orifice at the appropriate elevation) to provide that that the applicable drain down time of 48 hours is satisfied.

- The SWP3 must be revised to include detailed design drawings, including plan and profile views, of the post-construction BMPs that will be utilized to address the three locations, detailed above. In addition, specific information (i.e. water quality volume calculations, draindown times, etc) must be included to verify the design of the post-construction BMPs.
- The site's post-construction long-term operation and maintenance (O&M) plan will also have to be revised based upon the post-construction BMPs that will be installed at the site.

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 revised 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.

Sincerely,



Chris Moody
Environmental Specialist II
Division of Surface Water

CM/cs