



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

May 6, 2013

Mr. Ken Conaway  
Vice President  
DEC Land Company, LLC  
6375 Riverside Drive, Suite 220  
Dublin, Ohio 43017

**RE: CARRIAGE TRAILS SECTIONS 4 & 5 PHASE I (NPDES PERMIT 1GC04353\*AG);  
SECTION 5 PHASE 2 (NPDES PERMIT 1GC04612\*AG)  
SECTION 9 PHASE I (NPDES PERMIT 1GC04488\*AG)**

Dear Mr. Conaway:

On Tuesday, April 30, 2013, I inspected three sections of the Carriage Trails residential development project in Huber Heights to determine compliance with their NPDES construction site storm water discharge permits. I did not meet with anyone while at the sites.

Based on my observations, the sites are in violation of the following sections of their permits:

**Section 9 Phase I**

**1. Part III.G.1.x. Construction Entrance**

The entrance on to what soon will be Lakeside Street should be set up as a construction entrance to minimize drag out of mud. Heavy stone placed (ideally) over geotextile fabric can serve as the base of the new road if elevations are right, at least for the first few dozen feet beyond the end of the existing road apron.

**2. Part III.G.2.iv Inlet Protection**

A storm sewer inlet located in a small (and possibly temporary) detention basin in the southeast part of Section 9 was observed to be unblocked. Disturbed soils immediately surrounding this inlet are not likely to be at final grade soon, so measures to permanently stabilize cannot yet be taken. A vertical stake wrapped with silt fence was observed near the inlet. It is assumed that this silt fence is unwrapped from the stake and placed in front of the inlet when runoff is moving through the basin, though it's not clear how the fabric would be held against the opening. This inlet should be blocked altogether until the basin is filled and the area surrounding the field grate (above the pipe inlet) is brought up to grade. If possible, water should be kept from entering the newly installed storm sewer line uphill of this basin until surrounding soils can be worked toward something close to final grade.

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A second storm sewer field inlet was observed near the southwestern corner Section 9, in a low spot surrounded by graded dirt that was not yet stabilized. A sediment control "cage" normally installed over the grated opening was off to the side where it would do no good. Please explain in a written response to this letter, who is responsible for ensuring that sediment control structures present at the site are properly installed so that the loss of eroded sediment during rainstorms will be minimized.

### **Sections 4 and 5**

#### **Part III.g.2.d Sediment Control Practices**

Bare banks were observed adjacent to a small drainage that will soon be culverted with a 54 inch diameter pipe. Depending on the length of time disturbed soils remain idle, they are supposed to be temporarily stabilized, or at a minimum, controls must be installed to help keep eroded sediments on the site during rainstorms. We discussed during a telephone conversation Monday, May 6, 2013, using compost or straw filled tubes as a temporary sediment control along these barren banks until the time comes to backfill the culvert, after which cover soils can be stabilized as required. Tubes should be placed partway down the embankments, but not so far that they could be swept away by high flow caused during a rain.

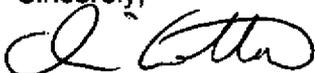
In addition to the above requested information, please provide for each section, within 14 days of receipt of this letter, the following:

1. Copies of weekly sediment control inspections logs kept for the last 2 months;
2. Copies of Storm Water Pollution Prevention Plans (SWP3s);
3. How post-construction storm water runoff management requirements are being met (for details see page 20 of the construction permit.).

As a reminder, please note that when construction is complete, and all areas of the site have been permanently stabilized with vegetation or other ground cover, the construction permit issued to these projects must be terminated. A one page "notice of termination" (NOT) form will be found at [http://www.epa.ohio.gov/Portals/35/permits/General NOT.pdf](http://www.epa.ohio.gov/Portals/35/permits/General%20NOT.pdf). A completed form must be sent (assuming the criteria for "final stabilization" have been met – see page 37 of the permit) to the address shown on page 2 of the NOT instructions.

If you have questions regarding the letter you can contact me at (937) 285-6442, or via email at [chris.cotton@epa.ohio.gov](mailto:chris.cotton@epa.ohio.gov).

Sincerely,



Chris Cotton  
Environmental Specialist II  
Division of Surface Water

cc: Ohio EPA/SWDO/DSW Files  
ec: Russ Bergman, P.E. City of Huber Heights Engineer

CC\bp