



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

June 18, 2013

RE: PORTAGE COUNTY
CITY OF STREETSBORO
STREETSBORO FAMILY HOMES
NPDES PERMIT NO. OHC000003
OHIO EPA PERMIT NO. 3GC05900*AG
CONSTRUCTION STORM WATER

Ms. Kelley Coey
Pirhl Developers LLC
4949 Galaxy Parkways, Suite S
Warrensville Heights, OH 44128

Dear Ms. Coey:

On May 31, 2013, Ohio EPA conducted an audit of the City of Streetsboro and their Municipal Separate Storm Sewer System (MS4) Program. As part of the field review, our audit consisted of a site inspection of the Streetsboro Family Homes project located at Market Square Drive, North of SR 303 between Walters Rd. and Market Square Drive, City of Streetsboro, Portage County. Ohio EPA records indicate that the site is covered by the General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activity (General Storm Water Permit), permit No. 3GC05900*AG. I was accompanied by Molly Drinkuth of Ohio EPA, Randy Allar of GPD Group, and Amy Flake of the City of Streetsboro during this inspection. While on site, I was able to speak with Ralph Nobis, Superintendent as well as Jayson Porter, Project Manager. The inspection documented the following deficiencies:

- The diversion berms indicated on the Storm Water Pollution Prevention Plan (SWP3) along the southern and western perimeters of the site were never installed. Diversion berms as well as any other type of erosion and sediment control must be installed within seven (7) days of grubbing the site and prior to any grading. It was noted that the site has been active since August of 2012 and not a single inspection report has noted the lack of these Best Management Practices (BMPs). The purpose of the diversion berms is to divert runoff to the sediment basin during construction since silt fence simply cannot tolerate the excessive slopes along these perimeters. As observed in the field and discussed with Ralph and Jayson, the slope of the site has caused the silt fence to fail time and time again. By simply implementing the diversion berms per the detail drawing on the approved SWP3, the silt fencing will not be overwhelmed during every rain event and less time and money can be wasted repairing it. The lack of these diversion berms was considered to be *the greatest concern* out of all the deficiencies observed in the field.
- The southwest corner of Market Place Drive is not shown on the SWP3. It was observed during this inspection that earth disturbing activity has occurred (mostly sidewalk work) as part of the Streetsboro Family Homes Project in this area; however, the SWP3 does not depict this area of disturbance or the BMPs necessary to control sediment and erosion. It was also observed that the BMPs in place (filter socks) are inadequate and must be replaced (See Figure 1). If no further earth disturbing activities are to occur in the southwest corner of Market Place Drive, the area must be stabilized immediately.

- The silt fence throughout the site needs to be repaired or replaced in many areas, particularly the southern perimeter and along the large stock pile. In addition, the silt fence was never properly installed. Referring to the detail drawings on the approved set of plans, the ends of two sections of silt fence must be wrapped together before staking to create a single continuous barrier (See Figure 2).
- The outfall which discharges into the sediment basin has severely eroded and lacks the appropriate outlet protection (i.e. Rock channel protection, Rip-rap). Eroded channels or gullies must be filled in before implementing outlet protection. Refer to the detail drawing on the approved SWP3 (See Figure 3).
- Stabilization issues were very apparent throughout the entire site, particularly the stock piles and the embankment of the sediment basin. It was observed that the construction sequence on the approved set of plans dictates that stabilizing the embankment of the sediment basin was to occur during the early stages of construction; essentially immediately after constructing it. Eroded channels or gullies must be filled in prior to stabilizing the embankment. In addition, any other areas throughout the site (e.g. the stock piles) which shall remain idle for greater than twenty-one (21) days require temporary stabilization until final grading is completed and permanent seeding can be placed (See Figures 4&5). Please notice (for future reference) that the requirements of the most recent NPDES General Construction Permit (OHC000004) have been updated such that any permits issued after April of 2013 require temporary stabilization of any areas which shall remain idle for greater than *fourteen (14) days*.
- The dewatering device connected to the outlet structure of the sediment basin for use during the construction process was not built per the details included on the SWP3. The approved SWP3 calls for a riser pipe while a skimmer device was used in practice. Although the skimmer device is actually *preferred* by Ohio EPA and is a new requirement of the General Construction Permit OHC000004 (effective April 2013), the plan must be amended to include details of the skimmer as well as provide calculations for sizing the orifice to ensure adequate draw down time of the de-watering volume. In addition, it was observed that the skimmer device was connected to the wrong orifice of the outlet structure and would not allow water to be drawn from the surface until nearly six feet (6') of runoff is accumulated in the basin. The skimmer is intended to be connected to the water quality orifice (located furthest from the top of the outlet structure) such that it can draw the cleanest water from the surface of the de-watering volume. The dewatering volume exists between the invert of the water quality orifice and the elevation specified on the approved SWP3. The SWP3 should also indicate whether or not the other orifices should be plugged during the construction process. In addition, guide posts should be installed to prevent the skimmer from moving sideways while floating in the basin (See Figure 6).
- The concrete washout pit in place was not adequate. The concrete washout pit must be reconstructed per the detail drawing on the SWP3 if additional concrete work is to occur on the project (See Figure 7). If the concrete washout pit needs to be moved to a different location for any reason, the SWP3 on site should indicate the new location of the BMP.

STREETSBORO FAMILY HOMES

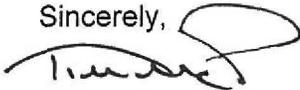
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- The inlet protection for the yard drains was inadequate or completely missing (See Figure 8). Inlet protection must be constructed per the detail drawing on the SWP3 including 2"x4" framing, chicken wire mesh, and geotextile fabric for all yard drains. The BMPs must remain intact until all contributing drainage areas have been completely stabilized.
- The dumpster(s) on site do not have a lid or a tarp to prevent their contents from polluting storm water runoff (See Figure 9). Storm water which comes in contact with solid wastes is considered to be a leachate and is not authorized to be discharged under the NPDES Permit issued for this site. If the dumpster company does not offer lidding options for these containers, a tarp must be laid over and tied down to the dumpster at the end of each work day or during any rain event.

As a first incidence, the issues described above shall be considered deficiencies. Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your response must be received and corrective action completed by July 3, 2013. If corrective action cannot be completed by this date, your response should indicate why, as well as include the date by when corrections will be completed. If a response is not received and/or a repeated incidence of the issues described in this letter occurs, these issues will escalate to violations and are subject to penalty as dictated by the City of Streetsboro Codified Ordinance Chapter 1193.99. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1125 or by e-mail at timothy.mcparland@epa.ohio.gov.

Sincerely,



Tim McParland
Assistant to the District Engineer
Division of Surface Water

TM:ddw

cc: Bruce Terrell, Engineering Department Director, City of Streetsboro

ec: Molly Drinkuth, DSW, NEDO
Amy Flake, City of Streetsboro (aflake@cityofstreetsboro.com)
Randy Allar, GPD Group (rallar@gpdgroup.com)
Ralph Nobis, Pirhl Developers LLC (rnobis@pirhl.com)
Jayson Porter, Pirhl Developers LLC (jporter@pirhl.com)



Figure 1. The filter sock is deteriorating. If filter socks are to be used as sediment control, the sock must be greater than or equal to 12" in diameter.



Figure 2. Silt fence is collapsing and the ends of each section are not twisted together properly.



Figure 3. The outfall is eroding severely and lacks appropriate protection.



Figure 4. Channels and gullies must be filled in prior to stabilization.



Figure 5. The embankment of the sediment basin should have been stabilized long ago.



Figure 6. The skimmer device is not properly installed and will not function as intended.



Figure 7. The concrete washout pit must be reconstructed.



Figure 8. Inlet protection must be constructed per the detail drawing on the SWP3.

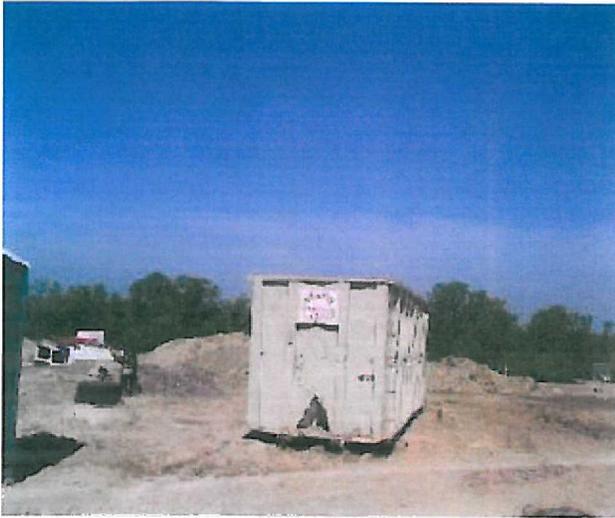


Figure 9. The dumpster needs to be covered at the end of each work day or during any rain event.