



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

July 5, 2013

RE: CUYAHOGA COUNTY
CITY OF CLEVELAND
CONSTRUCTION STORM WATER
PERMIT NO: 3GC06200*AG
MILES POINTE SENIOR LIVING CENTER

Michael Schumaker
John G Johnson Construction Company
8360 E Washington St
Chagrin Falls, OH 44023

Dear Mr. Schumaker:

On Wednesday June 5, 2013, I conducted an inspection at the above mentioned site to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC06200*AG. Accompanying me on my inspection was Julianna Murphy and Mike Beaty of the Ohio EPA Division of Surface Water and Scott Hudock, a project superintendent of JGJ Construction Company. Our records indicate that John G Johnson Construction Company was granted coverage to discharge storm water under the general NPDES permit for construction activities on November 11, 2012.

Upon our inspection of the site, the following deficiencies were noted:

- **Stabilization, i.e., seeding and mulching, has not been initiated as required by the NPDES permit.** The seeding attempt that had taken place the previous fall is inadequate. Temporary stabilization must be initiated within 7 days of last disturbance on any disturbed area of the site if it will not be further disturbed within 14 days of last disturbance. Permanent stabilization must be initiated within 7 days of reaching final grade. The soil stockpile is specifically in need of stabilization. **(Figure 2)**
- **Non-sediment pollution controls require repair and maintenance as per the NPDES Permit.** There was no concrete washout pit on site. Having a concrete washout pit greatly reduces the chance of any contaminated runoff from entering the wetlands that are located on site. **(Figure 1)** Please note that secondary containment, such as a containment dike or drip pan, and a spill kit are required for fuel tanks. **(An email sent June 11 stated that the fuel cell had been removed)** The construction entrance on Miles Avenue failed to prevent sediment from being tracked off of the site. Sediment tracking can be minimized by ensuring that good housekeeping practices are being followed. Having somebody sweep the entrance once or twice a day will largely reduce the sediment build up on and outside the entrance. **(Figure 4)**

- The SWP3 is a “living document”; this means that everything found on site must be shown on the plans and everything shown on the plans should be found on site. If changes to the site occur, amend the SWP3. The map on the SWP3 needs to show that the silt fence was extended over former construction entrances.
- Weekly inspections had not been conducted at proper intervals. Per the NPDES permit, weekly inspections are to take place once every 7 days and within 24 hours of a rainfall event of half an inch (0.5 inches) or greater.
- **Silt fence has not been installed in a functional manner or has not been maintained as required by the NPDES Permit. (Figure 3)** All sediment controls, including silt fence, must be capable of ponding runoff in order to settle sediment. Silt fence must be trenched and backfilled and the joint stakes of the silt fence must be connected by twisting the stakes together prior to staking them into the ground. **Please ensure that all joints are twisted together and repair silt fence so that it is functional.** Silt fence must remain in place until the upslope contributing drainage area has reached final stabilization. (i.e., a vegetative growth density of 70% or greater has been achieved.)

Please adjust your SWP3 to account for these changes that need to be made **and provide a letter of response indicating any corrective changes to be received no later than July 19, 2013.** If you have any questions, email me at Josh.Bewley@epa.ohio.gov or contact me at (330) 963-1128. If unavailable, you can also contact Dan Bogoevski at Dan.Bogoevski@epa.ohio.gov or (330) 963-1145.

Sincerely,



Josh Bewley
Assistant to the District Engineer
Division of Surface Water

JB:ddw

cc: Todd Houser, Cuyahoga SWCD
Scott Hudock, JGJ Construction Company
Frank G Jackson, Mayor of Cleveland

ec: Dan Bogoevski, DSW, Ohio EPA, NEDO



Figure 1: Wastewater associated with concrete washout could adversely affect the wetlands.

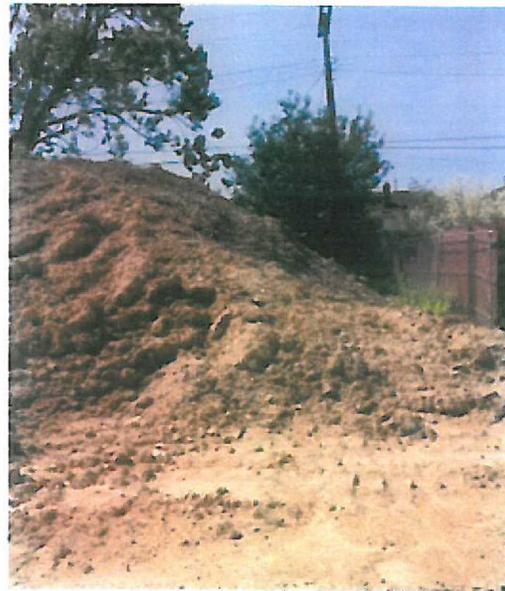


Figure 2: Stabilization is inadequate.



Figure 3: Fallen silt fence needs repair.

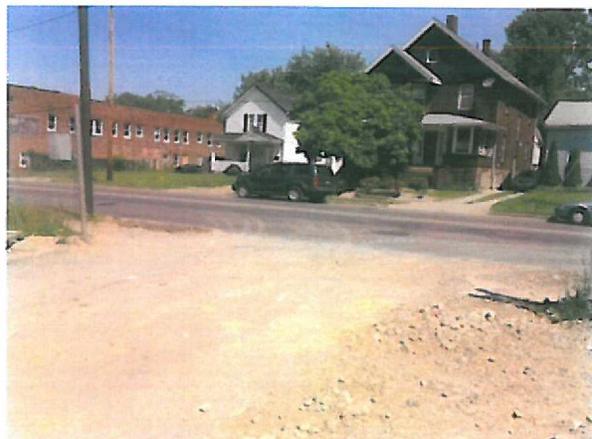


Figure 4: Construction entrance must be up kept.