



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

July 24, 2013

RE: CUYAHOGA COUNTY
CITY OF BEACHWOOD
CONSTRUCTION STORM WATER
PERMIT NO: 3GC05751*AG
BEACHWOOD REHABILITATION
HOSPITAL

Thomas Aschenbrenner
Cogdell Spencer Erdman
One Erdman Pl.
Madison, WI 53717

Dear Mr. Aschenbrenner:

On Wednesday July 8, 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 #3GC05751*AG. Accompanying me on my inspection was Randy Allar of GPD Group. Our records indicate that Cogdell Spencer Erdman was granted coverage to discharge storm water under the general NPDES permit for construction activities on December 7, 2011.

It appears that construction activities are complete however; the site has yet to reach final stabilization. **(Figure 1)** Final stabilization means that all soil disturbing activities at the site are complete and a uniform perennial vegetative cover (i.e., evenly distributed, without large bare areas) has reached a growth density of 70% or greater on all unpaved areas and areas not covered by permanent structures. Please be aware that NPDES permit coverage must be terminated within 45 days of when the site reaches final stabilization. In addition, all temporary erosion and sediment control practices must be removed and disposed and all sediment trapped by these practices must be permanently stabilized.

Before NPDES permit coverage can be terminated, post-construction water quality best management practices (post-construction BMPs) must be installed and a long-term maintenance plan must be provided to the party that will be responsible for long-term maintenance of those practices. **(Figure 2)** Post-construction BMPs are permanent site features that will remain in perpetuity to improve the quality of storm water runoff from the development site. Examples of post-construction BMPs include, but are not limited to, extended detention basins, bioretention cells (commonly known as "rain gardens"), sand filters, permeable pavement, and water quality swales. In some cases post-construction BMPs include non-structural preservation areas such as riparian and wetland setbacks.

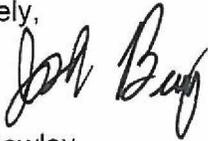
Please review the site with your city inspector and determine if the site has reached final stabilization and ensure that post-construction BMPs have been installed. If you determine that your site has reached final stabilization, you must terminate NPDES permit coverage by submitting a Notice of Termination (NOT) to:

Ohio Environmental Protection Agency
General Permit Program
P.O. Box 1049
Columbus, OH 43216-1049

The form and instructions are available at www.epa.ohio.gov/dsw/storm/stormform.aspx.

Please provide me with a letter of response indicating when final stabilization is expected to be achieved and when an NOT will be sent; to be received **no later than August 2, 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: Randy Allar, Inspector, GPD Group
Merle S. Gorden, Mayor, City of Beachwood

ec: Dan Bogoevski, Ohio EPA, DSW, NEDO



Figure 1: Certain areas still have yet to reach final stabilization.



Figure 2: The skimmer must be removed and a post-construction outlet structure must be installed prior to terminating NPDES permit coverage.