



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

August 7, 2013

RE: LORAIN COUNTY
CITY OF AVON
CONSTRUCTION STORM WATER
PERMIT NO: 3GC04531*AG
ARLINGTON PLACE SUBDIVISION NO 5

John Eavenson
K Hovnanian Oster Homes LLC
6150 Park Square Dr.
Lorain, OH 44053

Dear Mr. Eavenson:

On Thursday, July, 25 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 #3GC04531*AG. Accompanying me on my inspection was Dean Stoll of the Ohio EPA Division of Surface Water. Our records indicate that Oster Construction Inc. was granted coverage to discharge storm water under the general NPDES permit for construction activities on June 29, 2009.

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

- **Storm drain inlet protection has not been constructed per specifications contained in the SWP3. (Figures 1,2&3)** Inlet protection was constructed simply by encircling drains with silt fence. This has resulted in failed storm drain inlet protection. Please note that geotextile is to be supported by a wooden frame and cross braces constructed of 2"x4"s as well as wire mesh. Please review the specifications contained in the SWP3 and in *Rainwater and Land Development, Ohio's Standards for Stormwater Management, Land Development and Urban Stream Protection* (Ohio Department of Natural Resources, 2006), and install/repair inlet protection to meet these standards.
- **Silt fence has not been installed in a functional manner or has not been maintained as required by the NPDES Permit. (Figures 4&5)** 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.

JOHN EAVENSON
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Please adjust your SWP3 to account for any changes that need to be made **along with a letter of response indicating any corrective changes to be received no later than August 20, 2013**. If you have any questions, e-mail 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,

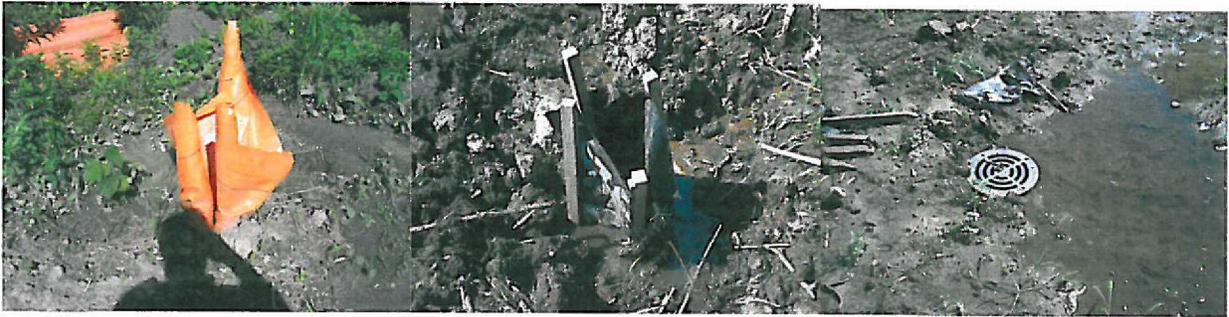


Josh Bewley
Assistant to the District Engineer
Division of Surface Water

JB:bo

pc: Rob Knopf, City Engineer, City of Avon
Tracy Workley, Storm Water Inspector, City of Avon
Brett Elek, Superintendent, Oster Homes
Mark Heffernan, Assistant Community Construction Manager, K. Hovnanian Homes
James A Smith, Mayor, City of Avon

ec: Dean Stoll, Division of Surface Water (Dean.Stoll@epa.ohio.gov)
Dan Bogoevski, Division of Surface Water (Dan.Bogoevski@epa.ohio.gov)



Figures 1,2&3: Inlet protection not built to specifications.



Figures 4&5: Silt fence needs to be extended where the upslope drainage area is yet to reach 70% vegetative growth density.