



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: 3GC06057\*AG  
STONEBRIDGE CREEK SUBDIVISION #12

Richard Batt  
Stonebridge Land Holdings LLC  
38745 Renwood Blvd.  
Avon, OH 44011

Dear Mr. Batt:

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 #3GC06057\*AG. Accompanying me on my inspection was Dean Stoll of Ohio EPA Division of Surface Water. We later met with Janet Johnson of Ryan Homes who showed us the SWP3 on site. Our records indicate that Stonebridge Land Holdings LLC was granted coverage to discharge storm water under the general NPDES permit for construction activities on July 31, 2012.

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

- Per NPDES Permit, the storm water pollution prevention plan (SWP3) is a "living document;" this means that everything 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, mark this on the SWP3. In particular, the concrete washout pit and the extended silt fence must be shown on the SWP3.
- **Silt fence has not been installed in a functional manner or has not been maintained as required by the NPDES Permit. (Figures 1,2&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.
- **Storm drain inlet protection has not been constructed per specifications contained in the SWP3. (Figures 4,5&6)** 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

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constructed of 2"x4"s as well as wire mesh. The jute/coir matting placed over top the curb inlets are not an effective form of inlet protection. They are designed for erosion control, not sediment control. 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.

- A ditch to the west of the roadway leads into a stream that flows away from the site. **(Figure 7) Per the NPDES permit, structural practices shall be designed and implemented on site to protect all adjacent surface waters of the state from the impacts of sediment runoff.** Proper sediment and erosion controls are necessary to protect the stream from receiving sediment runoff from the site.
- **Non-sediment pollution controls require repair and maintenance as per the NPDES Permit.** (Figure 8) The concrete washout pit was full. Please remove hardened concrete and restore the washout pit to its original design capacity to prevent an unauthorized discharge of wastewater to the environment.

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.** In addition, please send your 2 most recent weekly inspections and a detail of the post-construction storm water BMP intended for the site either by fax (330) 963-1128 or by email. If you have any questions, email me at [Josh.Bewley@epa.ohio.gov](mailto: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](mailto:Dan.Bogoevski@epa.ohio.gov) or (330) 963-1215.

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  
John Petrus, Ryan Homes  
James A Smith, Mayor, City of Avon  
Janet Johnson, Ryan Homes

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



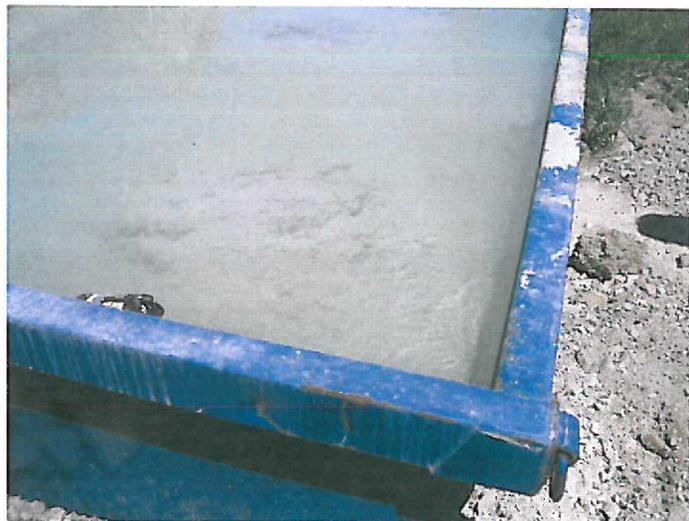
**Figures 1,2&3:** Silt fence in need of repair; must be tied off at the ends; must be extended to prevent runoff from entering the adjacent site.



**Figures 4,5&6:** Yard inlet protection not built to specifications; jute matting is not a sediment control, curb inlet protection has subsequently failed.



**Figure 7 (left):** The ditch drains to a stream that runs parallel to the west of the site.



**Figure 8 (right):** Concrete washout pit is full and in need of emptying.