



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: 3GC006359\*AG  
STONEBRIDGE ESTATES SUBDIVISION

Richard Batt  
T.G.G. Land LLC  
PO Box 245  
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 #3GC06359\*AG. Accompanying me on my inspection was Dean Stoll of the Ohio EPA Division of Surface Water. Nobody was available to meet with on site. Our records indicate that T.G.G Land LLC was granted coverage to discharge storm water under the general NPDES permit for construction activities on February 15, 2012.

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

- **Stabilization, i.e., seeding and mulching, has not been initiated as required by the NPDES permit. (Figures 1,2&3)** 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.
- **Storm drain inlet protection has not been constructed per specifications contained in the SWP3. (Figures 4&5)** Inlet protection was constructed simply by placing a metal plate over top the catch basins. 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.
- **The Rock Construction Entrance was inadequate, resulting in sediment tracking off of the site. (Figure 6)** Specifications for a Rock Construction Entrance can be found in Chapter 7 of the *Rainwater and Land Development Manual, Ohio's Standards for Stormwater Management, Land Development and Urban Stream Protection* (Ohio Department of Natural Resources, 2006).

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- **The NPDES permit states that if feasible; sediment settling ponds shall be dewatered at the pond surface using a skimmer or equivalent device. (Figure 7)**  
The sediment pond on site did not have a skimmer installed at the time of our inspection. In addition the NPDES permit states that sediment basins and perimeter sediment barriers shall be implemented prior to grading and within seven days from the start of grubbing. They shall continue to function until the up slope development area is restabilized. At the time of inspection, the sediment basin was incomplete.
- **Non-sediment pollution controls require repair and maintenance as per the NPDES Permit. (Figures 8&9)** On site, we observed where concrete had been washed out on bare soil. **ALL concrete washout is to occur ONLY at a washout pit location.** In addition, a machine onsite was observed leaking fluid. Please note that machine leakage must be scooped up and disposed of in a covered dumpster or other trash receptacle.

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 either by fax (330) 963-1128 or by e-mail. If you have any questions, e-mail 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) 963-1145.

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

ec: Dean Stoll, Division of Surface Water ([Dean.Stoll@epa.ohio.gov](mailto:Dean.Stoll@epa.ohio.gov))  
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**Figure 1,2&3:** Soil stabilization is to occur on any undisturbed areas that will remain unworked for 14 or more days.



**Figures 4&5:** Metal plate does not provide proper inlet protection.



**Figure 6:** Rock construction entrance is inadequate. **Figure 7:** Outlet structure is incomplete.



**Figure 8** (left): Concrete is to be washed out in a washout pit.

**Figure 9** (right): Machine leakage must be properly disposed of in a covered dumpster.