



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

September 16, 2013

RE: LAKE COUNTY  
CITY OF WILLOWICK  
CONSTRUCTION STORM WATER  
LARIMAR LAKEFRONT NEIGHBORHOOD  
PHASES II-IV  
FACILITY #3GC05670\*AG

Ted Sahley, Managing Partner  
Willowick Partners LLC  
30009 Lakeshore Blvd.  
Willowick, OH 44095

Dear Mr. Sahley:

On August 22, 2013, I met with Kirk Betteley, project supervisor for Willowick Partners LLC, at the above referenced construction site located on Lakeshore Blvd. I was accompanied by Nick Agins of the Lake Soil & Water Conservation District and Greg Devan of CT Consultants, city engineers for the City of Willowick. My inspection was made in response to a complaint received via e-mail from a concerned citizen noting a lack of sediment and erosion control. Our records indicate that storm water runoff from this construction site is authorized under the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water associated with Construction Activities #OHC000003.

My site inspection revealed the following violations of the NPDES permit:

- **Failure to maintain sediment ponds, silt fence and diversions to ensure continued performance of their intended function.** This is a violation of Part III.G.2.h of the NPDES permit and Ohio Revised Code (OAC) 6111.07 and 6111.04. This violation was noted in several locations:
  - **Sediment Trap** – Accumulated sediment must be removed from the trap to restore the sediment settling volume of 1000 cubic feet per acre of disturbed area and you must ensure that the trap provides a dewatering volume of at least 67 cubic yards per acre of total contributing drainage area. Please consult with your project engineer if adjustments to trap design are needed to meet NPDES requirements.
  - **Silt Fence** – The silt fence along the unnamed tributary to Lake Erie is in disrepair and must be replaced. Place silt fence on a level contour downslope of areas you expect to disturb. Silt fence must be trenched and backfilled with the ends turned back upslope to ensure that runoff ponds behind it and slowly seeps through the geotextile fabric. Silt fence placed above the Lake Erie shoreline has not been installed per these specifications and must be repaired.

- **Diversions** – Until the grade is such that storm sewers can convey runoff to the sediment trap, you must establish diversion channels or berms to collect runoff and convey it to the trap. This is particularly important along the north side of the site above the Lake Erie shoreline. Diversions have been attempted here previously, but have not been maintained.

Other observations we made in regards to the implementation of the storm water pollution prevention plan (SWP3):

- Please ensure that you are initiating temporary and permanent stabilization in the timeframes required by the NPDES permit. Please note that with the promulgation of federal effluent limitations and renewal of the NPDES permit on April 21, 2013, the criteria that determines where stabilization must occur has changed. You must initiate temporary stabilization within 7 days of last disturbance on all areas disturbed by construction activity that will remain idle, i.e., unworked, for 14 days or longer. The old standard was 21 days or longer. Please initiate temporary stabilization on all areas that meet this criterion. Permanent stabilization must be initiated within 7 days of reaching final grade. For either temporary or permanent stabilization, if the disturbed area is within 50 feet of a stream or Lake Erie, stabilization must be initiated within 2 days.
- Repair seeding is needed on the slope along the unnamed tributary to Lake Erie. Although this slope has been seeded and matted in the past, there are portions of the slope that remain bare or where erosion rills have formed. Please repair and stabilize as needed to establish a vegetative growth density of 70% or greater.
- The SWP3 indicates that storm drain inlet protection is to be provided on all curb and yard inlets. However, we noted that it was not installed on curb inlets and in some locations, installing inlet protection may have unintended consequences. As such, you were advised to utilize on-lot perimeter controls, e.g., silt fence, where storm drain inlet protection is not desirable. In all other situations, storm drain inlet protection should be installed on all curb and yard inlets as indicated in the SWP3 and must be installed on inlets that do not drain to the sediment trap.
- Excavation dewatering is being conducted by floating the pump intake on top of the impounded runoff. Although this is an acceptable method for dewatering, to minimize the discharge of sediment, you should wait at least 24 hours after a rain event to turn the pump on. This will give sediment time to settle in place before the runoff is discharged.
- If you intend to pour additional concrete and allow on-site rinsing of truck chutes, you must establish a concrete washout pit. Currently, a pit is not in place. Concrete washout pits must ensure that the wastewater they collect is not discharged to the storm water drainage systems of the site. Wastewater from the washout of concrete is a prohibited discharge.

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Please provide me with a letter of response indicating the actions you have taken or will take to address the violation and other concerns noted above. For actions not yet completed, provide a date by when you expect corrective action to be completed. If your response requires a revision to the SWP3, please provide me with a copy of the revised plan. Photos documenting corrective action should also accompany your response, where appropriate. Your response should be received **no later than September 30, 2013**.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski  
District Engineer  
Division of Surface Water

DB:ddw

cc: Joe Dominick, Willowick Partners, LLC  
Nick Agins, Lake SWCD  
Greg Devan, CT Consultants