



**Environmental  
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 21, 2011

RE: PORTAGE COUNTY  
HALLMARK CAMPUS COMMUNITIES  
CONSTRUCTION STORM WATER  
NPDES NO. 3GC05559\*AG  
CITY OF KENT

Michael Fite  
Hallmark Campus Communities  
150 East Broad Street  
Columbus, Ohio 43125

Dear Mr. Fite:

On November 18, 2011, this writer conducted an inspection of the above referenced site located at 5694 Rhodes Road, City of Kent, Portage County. I was accompanied by Doug Stonebraker, Superintendent, Continental Building Systems. The purpose of the inspection was to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities No. 3GC05559\*AG. Our records indicate that Hallmark Campus Communities was granted coverage under the NPDES permit on July 20, 2011. JTO Inc. was issued Co-Permittee coverage on August 31, 2011, and according to Mr. Stonebraker is the site manager for storm water.

During my inspection, I documented the following deficiencies:

1. Inlet protection has not been established in accordance with the Storm Water Pollution Prevention Plan (SWP3). Below are pictures for your reference of the inlet protection for the site and photos of what is in your plan. All inlets not installed as indicated in the SWP3 must be immediately retrofitted.
2. The sedimentation basin has not been constructed as designed in the SWP3. There is no permanent outlet structure or skimmer device. Below are pictures of the basin at the time of the inspection and what was approved on the plan. Mr. Stonebraker indicated that due to weather and flooding issues, that the basin was not installed until two week prior to my inspection. Limiting site conditions should be identified early during the development of the SWP3 and the basin should have been installed at the front end of the project. Part III.G.2.d.i of your permit requires that "Sediment basins and perimeter sediment barriers shall be implemented prior to grading and within seven days from the start of grubbing." The discharge of sediment laden water is directly to a wetlands located south of the site. Please be advised that discharging sediment to the wetland may be considered a filling activity and subject to regulation by the Army Corp. This is a

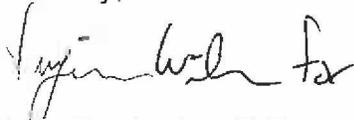
serious violation of your permit and must be addressed immediately. Additionally, since this basin discharges directly to a wetland, the outlet must be converted from a concentrated flow to a diffuse flow. The SWPPP must be amended to reflect this change.

3. A large amount of soil has been piled directly adjacent to the aforementioned sedimentation basin. Runoff has not been controlled by the use of sed fence or temporary seeding. If this dirt will not be used or removed and earth-moving activities will not be conducted in this area within 21 days of the last disturbance, you must temporarily stabilize this soil within two days of the last earth disturbance. Temporary stabilization is defined in the permit. Pictures are attached of the soil pile for your reference.

Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your response, along with any amendments to the SWP3, must be submitted to the Ohio EPA **no later than December 12, 2011**. It is Ohio EPA's expectation that all of these deficiencies will be addressed within 10 days of receipt of this letter.

If you have any questions regarding this matter, feel free to contact this writer at (330) 963-1136 or by e-mail at [phil.rhodes@epa.state.oh.us](mailto:phil.rhodes@epa.state.oh.us).

Sincerely,



Philip P. Rhodes, P.E.  
Environmental Specialist II  
Division of Surface Water

MH/cs

cc: Doug Stonebraker, Supt., Continental Building Systems  
Leong Tan, Project Engineer, JTO Inc  
Jennifer Barone, City of Kent

ec: Eileen Mohr, Ohio EPA, NEDO, DERR

