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2011/07/26

4GC03304

CCS GEORGIAN HEIGHTS ELEMENTARY SCHOOL



Environmental  
Protection Agency

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

July 25, 2011

Ron Minekime  
Columbus Board of Education – Facilities Office  
889 Seventeenth Avenue  
Columbus, OH 43211

**Re: Construction Storm Water Inspection at CCS Georgian Heights Elementary School /  
Franklin County  
Permit Number: 4GC03304\*AG  
(NOTICE OF VIOLATION)**

Dear Mr. Minekime:

This letter is written regarding a storm water inspection I conducted at CCS Georgian Heights Elementary School located at Salem Drive and Georgian Drive in Columbus Ohio on July 5, 2011. This letter also serves as a formal **Notice of Violation (NOV)** for the turbid discharges associated with the drilling operations into Big Run Creek. Please note, the **NOV is applicable to all Co-Permittees affiliated with this project**. The purpose of the inspection was to evaluate compliance with the General Storm Water Permit Associated with Construction Activities. During the inspection, I noted the following issues associated with construction activities at this site:

**Drilling Operations:**

- During the inspection, I noted turbid discharges directly impacting Big Run Creek (**see Figure 1 and 2**). This represents a direct violation to your General Storm Water Permit. Corrective measures are immediately expected to eliminate the turbid discharges associated with the drilling operations.
- I found all drilling fluids directed to an impoundment intended for sediment control associated with barren areas at the site. Please understand this impoundment is intended for storm water runoff from the site. Once drilling fluids are directed to this impoundment it eliminates the volume intended for sediment control.
- During the inspection, I met with Ryan Felumlee Superintendent for Roberts Company and Tom Andry representing Smoot/Elford Company. The joint inspection was conducted to evaluate the drilling operations associated with the site. We discussed alternatives to control and minimize sediment loss in association with the drilling operations. Please direct to my attention the corrective measure chosen to address these turbid discharges into Big Run Creek.
- This represents the second issue with respect to turbid discharges associated with drilling operations at Columbus School Projects. This issue was previously addressed at

- the Olde Orchard Elementary School in Reynoldsburg, Ohio earlier this construction season. Additional planning efforts must be considered concurrent with the development of a Storm Water Pollution Prevention Plan (SWPPP). Please indicate in your response letter the additional planning considerations chosen to ensure these types of violations do not result in a pattern of non-compliance.

**Sediment and erosion controls:**

- Please ensure the impoundment noted in the south east corner is utilized specifically for storm water runoff for this site. All storm water runoff from the site is expected to be routed to the sediment pond. Diversions may be necessary, specifically on the southern end of the project, to direct all barren areas to this impoundment.
- Be aware the General Permit states that all barren areas which remain idle in excess of 21 days must be protected from erosion within seven days of the last earth disturbing activities. In addition, erosion protection must be implemented for all areas of final grade within seven (7) days.

**Post Construction Requirements:**

- The General Storm Water Permit requires specific post construction water quality treatment for all sites. Guidance regarding the post construction requirements is found at: <http://www.epa.state.oh.us/dsw/storm/CGPPCQA.aspx>. Please submit to my attention (email preferred at [harry.kallipolitis@epa.state.oh.us](mailto:harry.kallipolitis@epa.state.oh.us)) which practice will be installed at this site to ensure compliance with the General Permit. Please include all design criteria and calculations in your submission.

If you have any questions regarding this letter or the inspection, please do not hesitate to call me at our Central District Office at (614) 728-3844 or email at: [harry.kallipolitis@epa.state.oh.us](mailto:harry.kallipolitis@epa.state.oh.us). In addition, please provide a written response (**email preferred**) to the action items addressed above within ten days from receipt of this letter. A follow up inspection will be conducted to ensure the minimum conditions of the General Permit have been met.

Sincerely,



Harry Kallipolitis  
Storm Water Coordinator  
Division of Surface Water  
Central District Office

- c: Jeff Bohne, Water Quality Supervisor, DSW / CDO  
Gutrage Plumbing Inc.  
Jamison Well Drilling Inc.  
JF Bernard Inc.  
Robertson Construction Services  
Vaghn Industries  
Boss Excavating and Grading Inc.