Environmental Protection Agency

Governor
Lt. Governor
Director

July 26, 2011

RE: LORAIN COUNTY
VILLAGE OF GRAFTON
MIDVIEW MIDDLE SCHOOL
NPDES PERMIT NO. OHC000003
OHIO EPA PERMIT NO. 3GC04797*AG
CONSTRUCTION STORM WATER

Ms. Susan Bobola
Midview School District
1010 Vivian Drive
Grafton, OH 44044

Dear Mrs. Bobola:

On July 19, 2011, Ohio EPA conducted an inspection of the Midview Middle School project located at 12865 Grafton Road, Village of Grafton, Lorain County. Ohio EPA records indicate that the site is covered by the General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activity (General Storm Water Permit), permit No. 3GC04797*AG. I spoke with Jason Antill from C.T. Taylor Construction and Rick Collins, Superintendent from Turner Construction while on site. The inspection documented the following:

- **The sediment basins have not been equipped with an appropriate dewatering device for sediment control during construction activities.**
  - According to Jason, Titan Excavating is responsible for the installation of the dewatering devices for the outlet structures of the sediment basins. Please be sure Titan Excavating installs the riser pipe dewatering devices detailed in the Storm Water Pollution Prevention Plan (SWP3) ***immediately*** to prevent sediment laden water from discharging to surface waters of the State. Failure to do such is a ***direct violation of the NPDES permit and punishable with fines up to $25,000 per day of violation*** (See Figures 1 & 2).

- **The construction drive is inadequate, resulting in offsite tracking of sediment from construction vehicles.**
  - The construction drive, as detailed in the SWP3, needs to consist of two (2) inch diameter stone, six (6) inches deep, and seventy (70) feet in length from the preexisting elementary school driveway. According to Rick, there is a Bobcat on site equipped with a broom device and the drive is swept free of sediment regularly (See Figure 3).

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- **There are areas of the site that need to be stabilized with seeding and straw mulch.**
    - Several areas of the site appear that they will remain idle for twenty one (21) days or greater. If this is the case, please stabilize these areas with seeding and straw mulch. Specifically, the sediment basins in the back of the site (opposite the preexisting elementary school) need to be stabilized immediately. This is because if the first sediment basin treats the runoff directed to it, and then discharges directly into the second basin (which is not stabilized), the treated runoff will collect sediment all over again and defeat the purpose of the dewatering device for the outlet structure in the first basin. To clarify, ***stabilize the second of the two consecutive basins*** in the back of the site, and ***install the riser pipe dewatering device on the first one immediately*** (See Figure 4).

Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your response must be received and corrective action completed by August 8, 2011. If corrective action cannot be completed by this date, your response should include the date by when corrections will be completed. Also, please fax a copy of your most recent storm water inspection report to my attention at (330) 487-0769 or via e-mail at timothy.mcparland@epa.state.oh.us. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1128.

Sincerely,

Tim McParland
Assistant to the District Engineer
Division of Surface Water

TM/mt

cc: Lorain SWCD
Shari Szczepanski, Village of Grafton, Mayor
Rick Kowalski, Village of Grafton, MS4 Program Manager

ec: Dan Bogoevski, DSW, NEDO
Gary Smith, Titan Excavating
Rick Collins, Turner Construction
Jason Antill, C.T. Taylor Construction

Figure 1. The outlet structure is missing a dewatering device.

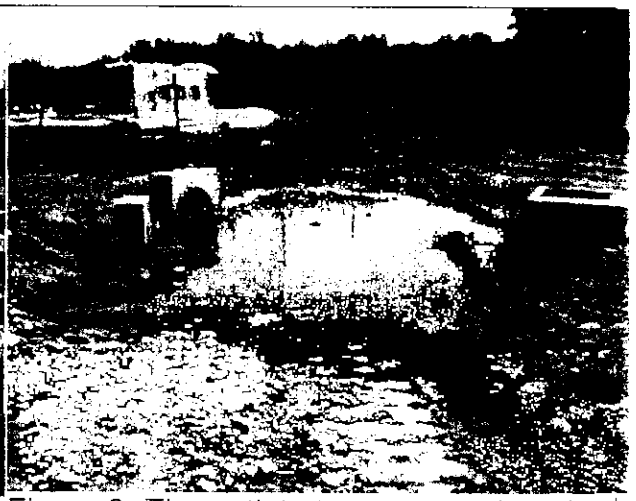

Figure 2. The outlet structure needs to be connected to a riser pipe.

Figure 3. The construction drive is inadequate.

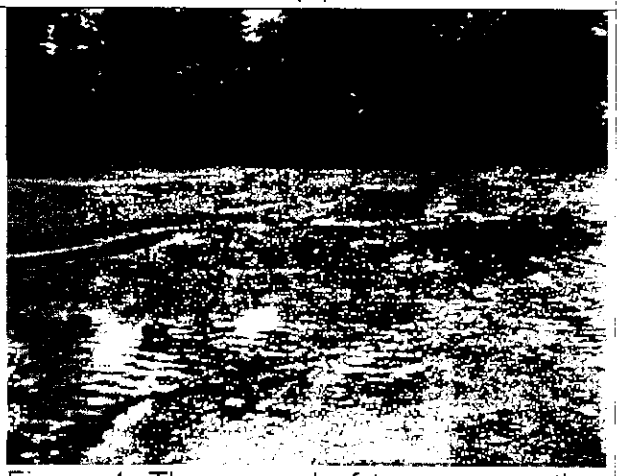

Figure 4. The second of two consecutive sediment basins needs to be stabilized.