



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Kortesik, Director

December 10, 2010

RE: LORAIN COUNTY
HENRIETTA TWP.
HENRIETTA SUBSTATION
CONSTRUCTION STORM WATER

Mr. Vincent Conant
Environmental Specialist
First Energy
76 South Main St.
Akron, OH 44308

Dear Mr. Conant:

Ohio EPA is in receipt of your letter dated December 6, 2010, and e-mail sent December 7, 2010, in regards to the storm water pollution prevention plan (SWP3) for the above referenced site. Our records indicate that American Transmissions Systems Inc (ATSI), a sister company of First Energy, has obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC04957*AG.

The SWP3 indicates that the underdrain discharge pipe will be shortened and a level spreader and 25-to-30-foot grass filter strip will be provided at the end of the underdrain discharge pipe to address post-construction requirements of the NPDES permit. Because this is a small construction site, i.e., the larger common plan of development or sale disturbs less than 5 acres of land, and because we are trying to address these requirements after installation of the underdrain system has occurred, Ohio EPA concurs that the proposed post-construction best management practices will meet the minimum standards of the NPDES permit. However, when designing future substations with underdrain systems, First Energy should review the design of its underdrain systems and determine if they can be designed to provide uniform sheet flow from the full width of the substation base area through a grass filter strip. By dispersing the flow through a filter strip that is as wide as the area that generates the runoff, the water quality function of the filter strip is improved. Further, the addition of a permeable berm across the entire width of the filter strip along the downslope edge will allow for shallow, dispersed treatment of the Water Quality Volume (WQv) through ponding, and subsequent infiltration, settling or filtration of pollutants. The WQv is the runoff volume generated by the first 0.75 inches of rainfall. National studies of urban runoff pollution indicate that "first flush" runoff contains the highest concentration of pollutants.

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We thank you for your cooperation in resolving this matter. Review by Ohio EPA does not constitute approval from local government. As a reminder, Lorain Soil & Water Conservation District (SWCD) will still need to review the post-construction BMP plan for compliance with local regulations and will send you separate correspondence regarding this matter.

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

Sincerely,

A handwritten signature in black ink that reads "Bill Zinsler for". The signature is written in a cursive, flowing style.

Dan Bogoevski
District Engineer
Division of Surface Water

DB/mt

cc: Nancy Funni, Lorain SWCD
Wayne Miletic, Lorain County Engineers Office
Trustees, Henrietta Twp.
Scott Brown, ATSI