



**Environmental  
Protection Agency**

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

Re: Crestline PK-12 School  
Construction  
Storm Water

January 4, 2011

Mr. Dave Heflinger  
Crestline Exempted Village School District  
511 South Thoman Street  
Crestline, Ohio 44827

Mr. Luke Keller, Superintendent  
Telamon Construction, Inc.  
5505 Milan Road  
P. O. Box 418  
Sandusky, Ohio 44871

Mr. Jason McLeod, Project Manager  
Heery International, Inc.  
50 Public Square, Suite 2175  
Cleveland, Ohio 44113

Dear Sirs:

On December 1, 2010, Michelle Sharp and I inspected the Crestline PK-12 School, located at 435 Oldfield Road, Crestline. The purpose of the visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with construction activity, Facility ID No 2GC02720. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Luke Keller, Superintendent from Telamon Construction, and Jason McLeod, Project Manager from Heery International, were present to provide information.

Ohio EPA has no record of other permittees for this project. Please be sure to have all construction site operators, as defined in Part VII.O. of the Construction General Permit, submit the Co-Permittee Notice Of Intent (NOI) application for this project. This form is used by construction site operators to become co-permittees with the initial permittee of a construction site. Part II.A of the Construction General Permit (or CGP) **requires all operators at a construction site to become co-permittees**. Copies of the Co-Permittee NOI may be downloaded from our website at <http://epa.ohio.gov/dsw/storm/stormform.aspx>.

As a result of our visit, I have the following comments:

1. At the time of the visit, there was no earthwork occurring. The project broke ground in early September and rough grading had been completed the previous week. The project is multi-phased, with the next phase (basic building construction) being bid at that time. *Most of the storm sewers were installed. Some of the water lines and sanitary sewer*

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lines were installed. The uncompleted portions of the water and the sanitary sewer are to be constructed in the location of the existing school building. The existing building is slated to be demolished in 2012.

2. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available. Inspection logs were not. The permittee is responsible for ensuring that an experienced professional conducts inspections of the site weekly and within 24 hours of a 0.5 inch or greater rainfall. Inspections must include: disturbed areas, material storage areas, all sediment and erosion control measures, discharge locations, and all vehicle access points. Records must include: inspector name and qualifications, inspection date, observations, a certification that the facility is in compliance with the SWP3 and the permit, and identify any incidents of non-compliance. The record and certification must be signed in accordance with Part V.G. of the permit. *This is a violation of Part III. G.2.i. of the permit.*

The permit also requires that a log documenting grading and stabilization activities, as well as amendments to the SWP3, be maintained (see Part III.G.1.m. of the permit). While a site activity log was kept, I recommend that a site map be used to more accurately delineate work areas and note the related dates. The purpose of the log is to help document compliance with the permit's stabilization requirements. Stabilization is required on any idle portion of the site, including a stockpile as small as a car, which may get overlooked on large sites when the activity notes are broad.

3. The primary sediment control required for this project is a sediment settling pond. Most of the site appeared to drain to a retention pond with extended detention in the northwest corner of the site. Based on a cursory review of the SWP3, the calculations of the needed sediment storage and dewatering volume appeared acceptable. There may be an issue as to whether the pond meets the minimum 2:1 length:width ratio between the inlets and the outlet, as the outlet structure was installed further south than what was originally designed. *Permit Requires:* To qualify as a sediment settling pond, structures must meet the following specifications: a dewatering zone sized at 67 cubic yards per total contributing drainage acre; dewatering depth less than or equal to 5 ft. (optimal depths are between 3 to 5 ft.); for ponds serving 5 acres or more, the dewatering zone shall have a minimum 48-hour drain time; a sediment storage zone sized at 1000 c.f. per disturbed acre; and the distance between inlets and the outlet at least 2:1 length:width ratio. *Please see Part III.G.2.d.ii. of the permit.* Within 10 days of the date on this letter, please submit written verification from your storm water professional that the pond's current configuration meets these criteria.
4. As for other structural controls ... A stone construction entrance was in place and in good condition. Silt fence had been installed around the perimeter of the site. It did require maintenance (tear in fabric) in a few locations. Inlet protection had been installed

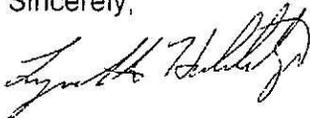
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on most of the inlets. There did appear to be one catch basin along the west side that was missing inlet protection. *Permit Requires:* All control practices shall be maintained and repaired as needed to assure continued performance of their intended function. *Please see Part III.G.2.h. of the permit.* Also, *Permit Requires:* Control practices must be repaired within 3 days of inspection. Sediment settling ponds must be maintained within 10 days of inspection. *Please see Part III.G.2.i.i. of the permit.*

5. The football field had been seeded and mulched, but growth was sparse at that time. A sub-contractor was scheduled to put fence around the field and the storm water pond. The remainder of the site was bare. *Permit Requires:* Portions of the construction site which will be inactive for more than 21 days must have temporary stabilization initiated within the first seven. Temporary stabilization is required prior to the onset of winter weather for ground that will be idle over winter. Permanent stabilization is required within 7 days on any portion of the site that has reached final grade or will be idle for longer than 1 year. Soil stabilization practices shall be initiated within two (2) days on inactive, barren areas within 50 feet of a stream. Permanent seeding and mulching is required before construction activity is completed throughout the entire site. If seasonal conditions prohibit the establishment of vegetative cover, other means, such as mulching and matting, must still be used and maintained until more permanent methods can be implemented. *Please see Part III.G.2.b.i. of the permit.* At a minimum, temporary stabilization must be applied to all bare idle areas of the site. Options include: erosion control blankets, straw mulch with a tackifier, or a soil binder.

Within 10 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to prevent future violations. Your response should include the dates, either actual or proposed, for the completion of the actions. If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette Hablitzel, P.E.  
Division of Surface Water  
Storm Water Program

/cs

pc: ~~DSW~~ NWDO File

ec: Marc Milliron, Asst. Safety Service Director, City of Crestline