



**Environmental
Protection Agency**

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

Re: Sunrise Cooperative
Construction
Storm Water

January 4, 2011

Mr. Brian Clouse
Clouse Construction
4382 West Township Road 90
New Riegel, Ohio 44853

Dear Mr. Clouse:

On December 1, 2010, Michelle Sharp and I inspected the Sunrise Cooperative, located at 2155 SR 598, Crestline (photos taken). 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 2GC02528. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Ohio EPA has no record of other permittees for this project.

1. At the time of the visit, there was no earthwork occurring. Drives and utilities were installed. Several buildings and storage silos had been completed. Contractors were performing some interior work in the northern building that held offices. As a site/project manager was not available, we did not request to review the Storm Water Pollution Prevention Plan (SWP3) or inspection logs.
2. Most of the site appeared to drain to the retention pond on the northeast side of the facility. As the SWP3 was not reviewed, we could not verify at the time whether the retention pond was of sufficient depth, volume, and configuration to fulfill the requirement of a sediment settling basin.
3. In the southeast portion of the facility (north of the railroad tracks, south of the woods, east of the silos), some of the site drained east, directly into Allen Run. This part of the site contained a large area of fill and a large soil stockpile. Sediment controls were not in place to address runoff from this bare ground. *Permit Requires: Structural practices shall be implemented to protect adjacent streams. This is a violation of Part III.G.2.d.v. of the permit.* Sediment controls will need to be installed and maintained until the upslope area reaches a 70% density of vegetative cover. Please note that the use of straw bales is not an accepted method of sediment control. Information on the proper application and installation of sediment controls can be found in the current edition of *Rainwater and Land Development: Ohio's Standards for Storm Water Management, Land Development, and Urban Stream Protection* prepared by Dan Mecklenburg. A copy of this Manual may be obtained at <http://www.dnr.state.oh.us/tabid/9186/default.aspx>.

4. Portions of the site had been seeded and grass was evident. However, all temporary or permanent stabilization had not been established. Bare soil was evident on the hillside north of the S.R. 598 access drive, on the soil stockpile west of Allen Run, and the area of fill west of the stockpile. Rill erosion was observed and a gully appeared to be forming between the stockpile and Allen Run. *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. *Failure to do so is a violation of Part III.G.2.b.i. of the permit.* At a minimum, temporary stabilization must be applied. Options include: erosion control blankets, straw mulch with a tackifier, or a soil binder.
5. In addition to the gully forming on the west side of Allen Run, runoff from an area northeast of the silos and southwest of the woods appeared to be forming a channel that flowed north towards the retention pond. If runoff will continue to be routed along these paths, more stable channels must be created in both locations (a shaped channel/letdown structure stabilized with grass using erosion control matting or with geotextile placed under riprap, depending on design conditions). Information on proper stabilization methods and the design of storm water outfalls can be found in the current edition of Ohio's *Rainwater and Land Development Manual* (ODNR).
6. As the SWP3 was not reviewed, we did not verify if the detention pond in the southwest corner of the site meets the permit requirements for post-construction storm water management. Under the conditions of the permit, this project is required to have one or more of the permanent structural post-construction Best Management Practices (BMPs) listed in Table 2 of the permit to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards listed in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv is to be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. Drain times must meet those in Table 2 of the permit.

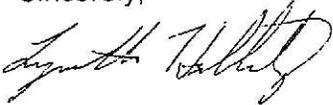
Within 10 days of the date on this letter, please submit to this office **written notification** as to the actions taken or proposed to prevent any future violations. Your response should include the dates, either actual or proposed, for the completion of the actions. Please submit the information in the Storm Water Pollution Prevention Plan (SWP3) that demonstrates how the post-construction storm water management requirement will be met. Your reply should include a statement about the type(s) of BMPs implemented, a site map showing the location of each practice, a delineation of its tributary drainage area and its size, and the basis for its design. For each control include: the calculations of the Water Quality Volume (WQv), and a detail drawing

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of the structure with relevant elevations, stage-storage tables, and release rate calculations. Your reply must address how the Post-Construction requirement will be met for all disturbed areas.

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~~; ~~Eite~~

ec: Marc Milliron, Asst. Safety Service Director, City of Crestline
George Secor, CEO, Sunrise Cooperative
Mike Oehlhof, Grain Manager, Sunrise Cooperative (Crestline)
Steve Niese, Agronomy Manager, Sunrise Cooperative (Crestline)