



**Environmental
Protection Agency**

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

Re Crawford County
Westmoor Sanitary Sewer Project
Construction
Storm Water

July 28, 2010

Douglas J Weisenauer
Crawford Co Commissioners
112 E Main St.
Bucyrus, OH 44820

And

Ted Mann, Operations Manager
Elite Excavation Company of Ohio, Inc
P.O. Box 290
Ontario, OH 44862

Dear Mr. Weisenauer and Mr. Mann:

On June 8, 2010 and June 14, 2010, Sarah Clement and Judson Delancy inspected the Westmoor Sanitary Sewer Project in Polk Township, Crawford County (photos taken). On July 1, 2010, I inspected the project. The purpose of our visits 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. 2GC02598*AG. The inspections were conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. On June 8th and 14th, Gary Weigler of Richland Engineering was present to provide information on the project. On July 1st, I was accompanied by Kristy Hunt, Division of Environmental and Financial Assistance, and Cecil Newcome, Crawford County Engineer.

As a result of the inspections, I have the following comments:

June 8 and 14

1. At the time of both inspections, construction was ongoing. As of June 14th, the sanitary sewer pumping station on the east side of Biddle Road, which pumps to the wastewater treatment plant, was completed. Copies of the Storm Water Pollution Prevention Plan (SWP3) and inspection logs were available during the June inspections. Inspection logs were kept, but not weekly and within 24 hours of a .5" rainfall. Inspections must be conducted weekly and within 24 hours of a .5" rainfall. Inspections must include: disturbed areas, material storage areas, all sediment and erosion control measures, discharge locations, and all vehicle access points.

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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.*

2. The stream protection for the streams on Biddle Rd., north of Galion-New Winchester Rd. were failing in June. The silt fences on the banks of the stream were falling over and need to be fixed. *This is a violation of Part III.G.2.d.v. of the permit.* According to a July 16, 2010 e-mail from Mr. Mann, silt fence on the south side has been reinstalled.
3. Temporary or permanent stabilization had not been applied along Biddle Rd, south of Galion-New Winchester Rd., as well as on the soil stockpile on Biddle Road, south of Galion-New Winchester Rd. The presence of weathered soil, rills, and weed growth indicate the time frame for stabilization may have been exceeded.

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 a 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 surface water. 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.* According to a July 16, 2010 e-mail from Mr. Mann, all exposed dirt at the Biddle Road pump station has been mulched

4. Staff observed falling silt fence throughout the project site. *Permit Requires:* All control practices shall be maintained and repaired as needed to assure continued performance of their intended function. *This is a violation of Part III.G.2.h. of the permit.* For more information on the correct installation and maintenance techniques for these practices, please see the *Rainwater and Land Development Manual*. *Permit Requires:* Control practices must be repaired within 3 days of inspection. *Please see Part III.G.2.i. of the permit.*

July 1

5. Pump Station on Biddle Road.
The soil stockpile on Biddle Rd., south of Galion-New Winchester Rd. was not stabilized. Since this was noted on the June 8th inspection, it appears that 21 days has been exceeded. My understanding is that sewer work is complete along Galion-New Winchester Road except for sewer laterals, however stabilization measures had not been initiated in the ditch on the south side of the road.

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This is a violation of Part III.G.2.b.i. of the permit. At a minimum, temporary stabilization needs to be applied. A stockpile can be mulched while maintaining a working face, if one is needed. According to a July 16, 2010, e-mail from Mr. Mann, all exposed dirt at the Biddle Road pump station has been mulched. For the channel, the site conditions (grade/velocity) may require that erosion control blankets be installed.

Straw bales had been placed in a roadside ditch along Galion-New Winchester Road. The bales were not entrenched and water had eroded around the side of the bales. The straw mulch south of Galion-New Winchester Road did not appear as thick as required. According to Mr. Newcome, no tackifier or seeding accompanied the mulch. The centerline of the swale on the east side of the road was bare. *Permit Requires:* All erosion and sediment control practices used to meet the conditions of this permit should meet the standards and specifications of the current edition of Ohio's *Rainwater and Land Development Manual* (ODNR) or other standards acceptable to Ohio EPA. And, operators shall undertake special measures to stabilize channels, outfalls, and prevent erosive flows. *These are violations of Parts III.G.2. and 2.b.ii., respectively, of the permit.* Straw bales are not an accepted erosion or sediment control **and must be removed**. Rock check dams are recommended to reduce the velocity. According to Mr. Mann's July 16, 2010 e-mail, this area was permanently seeded and rock check dams were added. Please keep in mind that straw mulch is to be applied at a rate of 2-3 bales per 1000 sq. ft. Visually, this should achieve an evenly distributed surface coverage of 90% and be about 1 to 2 inches deep.

The silt fence installed north of the pump station had a couple of trenches cut to it. The fenceline was sagging and appeared undercut. *Permit Requires:* All control practices shall be maintained and repaired as needed to assure continued performance of their intended function. *This is a violation of Part III.G.2.h. of the permit.* It should be noted that silt fence is only appropriate for sheet flow and small drainage areas (less than half acre when slope is less than 2 %). Make sure runoff is sheet flow when directed to the fence line (may need level spreader) and that the fabric is entrenched 6 inches. According to Mr. Mann's July 16, 2010 e-mail, silt fence was reinstalled properly and additional mulch added.

A ditch south of the pump station had flow. The rip rap placed on the banks did not cover the entire bare area of both banks. *Failure to adequately stabilize the banks is a violation of Part III.G.2.b.i. of the permit.* Silt fence was placed on both sides of the ditch, but it was not entrenched and a stake on the north side of the ditch was not the minimum size of 2x2. However, the grade on the north side of the ditch sloped away from the silt fence. *Failure to properly install silt fence is a violation of Part III.G.2. of the permit.* Please see the Rainwater Manual for notes on the correct installation method. According to Mr. Mann's July 16, 2010 e-mail, additional rip rap was added, silt fence on the south side of the ditch was reinstalled, silt fence on north side of the fence was removed and additional mulch was added.

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6. The sanitary force main along the east side of Biddle Road, running south of pump station and towards the WWTP was installed and the trench backfilled. *Failure to stabilize the ground is a violation of Part III.G.2.b.i. of the permit.* According to Mr. Mann's July 16, 2010 e-mail, this area was permanently seeded and mulched.
7. The force main located north of Glade Avenue, east of Biddle and west of the WWTP was installed and it appeared that the ground was at rough grade. Based on the presence of seed and the sparse growth of grass, it seemed this area had been seeded. Mulch had not been applied. *Failure to use a method of stabilization that provides cover is a violation of Part III.G.2.b. of the permit.*
8. There is a low area north of the WWTP, where the force main entered the plant. While sediment transport out of the project area was not observed, sediment controls had not been installed to protect adjacent properties and water resources. Please see Part III.G.2.d.iii. of the permit. I understand from Mr. Mann's July 16, 2010 e-mail that silt fence has since been installed in this area.
9. Permanent seeding was completed along Kline, from S.R. 19 to Tracht Drive. A good growth of grass was present. The Tracht Drive pump station had straw mulch. The coverage was thin, the straw had not been disced in nor did there appear to be tackifier to prolong the length of its performance. Please see the Rainwater Manual for application rates and methods. Keep in mind that if temporary stabilization methods decline, reapplication is required. I understand from Mr. Mann's July 16, 2010 e-mail that additional fill was added to the area; the electrical subcontractor is planning on working in this area later that week; and mulch will be reapplied after the work is completed.
10. Workers were placing straw mulch near Tracht Drive and Biddle Road. Along Meadow, it had been seeded and mulched, with grass growing. A small stockpile was present and had not been stabilized. It is my understanding from Mr. Mann's July 16, 2010, e-mail that the pile belonged to a property owner. Inlet protection had been installed in this area and appeared acceptable.
11. South of S.R. 19 and east of Biddle, there is a stream that had silt fence installed along its bank. The fence was sagging near S.R. 19. A section of the fence was not entrenched. *Failure to properly install and maintain controls is a violation of Part III.G.2.b.i and h. of the permit.* It is my understanding from Mr. Mann's July 16, 2010 e-mail that silt fence was installed along both sides of the ditch and on both sides of SR 19, after work was completed. Rip rap was placed at disturbed areas along the box culvert and ditch. All remaining areas were mulched.
12. A manhole was being dewatered at 380 Evans Avenue. According to Mr. Newcome, this had been ongoing for two months. The water was discharging onto a small block before traversing over bare ground. The discharge went past two isolated straw bales placed in series along its flowpath. The stream was turbid from this discharge. *Permit Requires:*

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There shall be no turbid discharges to surface waters of the state resulting from dewatering. Trench or ground water containing sediment must pass through a sediment settling pond or other equally effective sediment control device prior to being discharged from the site. Alternatively, sediment may be removed by settling in place or dewatering from a sump pit, filter bag, or comparable practice. Steps must be taken to ensure that it does not become pollutant laden by traversing over disturbed soils or other pollutant sources. *This is a violation of Part III.G.2.g.iv. of the permit.* Again, straw bales are not an accepted practice. I understand from Mr. Mann's July 16, 2010 e-mail that the dewatering activity has ceased. For future activities, please be sure to create a stable path from the end of the hose to the receiving stream.

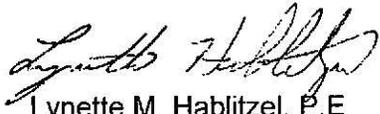
13. Catch basins on Evans Avenue appeared to have inlet protection. A small stream cut through the rear of 375 Evans Avenue. No sediment controls had been installed. *Permit Requires:* Structural practices shall be implemented to protect adjacent streams. *This is a violation of Part III.G.2.d.v. of the permit.* Wood mulch was present from chipping, but it did not cover all the bare soil in this area. *This is a violation of Part III.G.2.b.i. of the permit.* I understand from Mr. Mann's July 16, 2010 e-mail that silt fence has been installed at the ditch crossing and temporary mulch was placed on any bare areas not already covered with wood chips.
14. Work was occurring on Chiswick and Greenbrier. The stream crossing off Greenbrier, east of SR 19, had silt fence placed on both stream banks. Not all of the fabric was entrenched. *This is a violation of Part III.G.2. of the permit.* Straw mulch had been placed on both sides of the stream, but it did not extend 50 ft. back from the waterway. The sanitary sewer in this area had been installed and trenches backfilled, but stabilization had not been applied. For the trench between Greenbrier and Evans... the sanitary sewer was installed and it appeared that 90% of the trench length has been backfilled, but stabilization had not been initiated. *These are violations of Part III.G.2.b.i. of the permit.* According to Mr. Mann's July 16, 2010, e-mail, silt fence was reinstalled; areas within 50 ft. of stream were mulched. Final grading activities and permanent seeding were to be done the week of July 26th.
15. A staging area and final spoils disposal site is on S.R. 19 across from Pizza Hut. The soil was very weathered in some locations. No soil stabilization had been applied. Silt fence was placed along the stream but most of site drains towards the road. The drainage area is large enough to require a sediment settling pond. Mr. Newcome and Ms. Hunt reported that the property has a private landowner. As more than 1 acre is disturbed and soil is being received from multiple projects, this site requires submittal of a separate Notice of Intent. Mr. Mann's email stated that only a portion of the site received material from this project. Please provide a scaled map outlining the area being used for the Westmoor project.

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Within 10 days of the date on this letter, please submit to this office **written notification** as to the reasons for the comments in Items 1., 4., 5., and 15., as well as 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 include the flow rate (fps) for the roadside swales on the south and east side of Biddle and Galion-Winchester Roads during a 10 year storm.

If there are any questions, please contact me at (419) 373-3009.

Sincerely,



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

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pc ~~NWDO file~~
Crawford County SWCD
Cecil Newcome, P.E.
Doug Beugly, Assistant Superintendent of Water/Wastewater, City of Galion

ec: Kristy Hunt, DEFA