

**Environmental
Protection Agency**

1. Governor
2. Lt. Governor
3. Director

July 1, 2010

RE: TRUMBULL COUNTY
LITTLE YANKEE RUN BASIN
BROOKFIELD TOWNSHIP
BROOKFIELD LOCAL SCHOOLS
PROP. K-12 FACILITY

NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Steve Stohla
Brookfield Local School District Board of Education
P.O. Box 209, 7003 Grove Street
Brookfield, OH 44403

Dear Mr. Stohla:

On May 28, 2010, Ohio EPA conducted an inspection of the Brookfield Local Schools Proposed K-12 Facility, located on Brookfield Road, also known as Bedford Road in Brookfield Township, Trumbull County (site). 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. 3GC04377*AG. I was accompanied by Chris Moody, Ohio EPA; Sean Green, Ohio EPA; and Jason Trapp, Trumbull County Soil and Water Conservation District. The inspection documented the following storm water violations that must be addressed:

- Concrete washout activities have taken place adjacent to an onsite sediment settling pond allowing washout to discharge directly into pond (Figure 1). Concrete washout must be relocated away from sediment settling pond and properly constructed with appropriate signage.
- All idle areas that have not been previously temporarily stabilized must be temporary stabilized to limit amount of sediment laden runoff (Figure 2).
- The silt fence that has been installed onsite requires maintenance (Figure 3). Silt fencing must be properly wrapped at connections to prevent runoff from passing through.
- The sediment trap has become choked with sediment and should be excavated to reestablish treatment capacity (Figure 4). In addition, the sediment trap appears to be undersized to treat sediment-laden runoff from the contributing drainage area. A copy of the site's storm water pollution prevention plan must be submitted for review. The design and sizing calculations must also be submitted.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

Mr. Steve Stohla
Brookfield Local Schools Proposed K-12 Facility
July 1, 2010
Page 2

- The diversion berm has been eroded in multiple locations and is not functioning properly (Figure 5). This is allowing runoff to flow offsite rather than being diverted to a sediment basin or trap for treatment.
- Near the construction entrance, concrete washout and runoff are combining and exiting site to roadside ditch (Figure 6). Runoff to roadside ditch must be avoided as roadside ditches contribute to "waters of the State."
- Erosion channels have formed at the construction entrance allowing sediment-laden runoff to discharge offsite untreated to "waters of the State" (Figure 7).
- A large amount of sediment is being allowed to enter the nearby offsite ditch (Figure 8 and 9). Sediment should be contained onsite and not allowed to be transported offsite. Temporary stabilization would effectively limit amount of sediment transported to this area.
- Silt fencing controls in adjacent ditch are not functioning properly (Figure 9). Sediment should not be entering ditch and could be limited by temporary seeding.
- Trash and debris in settling pond should be removed (Figure 10).

A written report detailing how the above deficiencies will be addressed must be submitted to Ohio EPA within seven days of receiving this letter. The above deficiencies must be addressed within 14 days of receiving this letter. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 487-1708.

Sincerely,



Cory Harris
Assistant to the District Engineer
Division of Surface Water

CH/mt

cc: Chris Moody, Ohio EPA, DSW, NEDO
Jason Trapp, Trumbull County Soil and Water Conservation District
Dave Grayson, Miller-Yount Paving
Hudson Construction



Figure 1 – Concrete washout activities should not be conducted adjacent to sediment settling pond. A proper washout area away from ponds should be constructed instead.



Figure 2 - All idle areas that have not been previously temporarily stabilized must be temporary stabilized to limit sediment laden runoff.

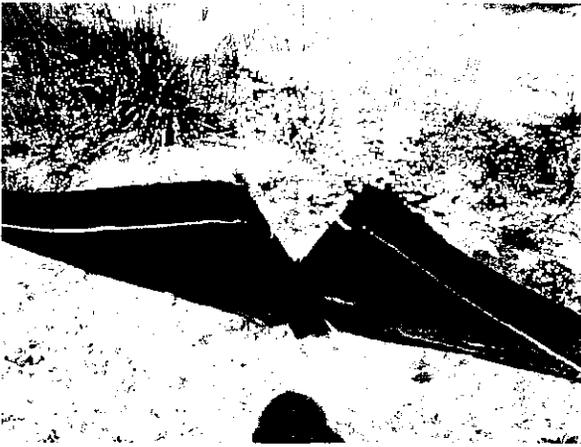


Figure 3 - The silt fence that has been installed onsite requires maintenance.

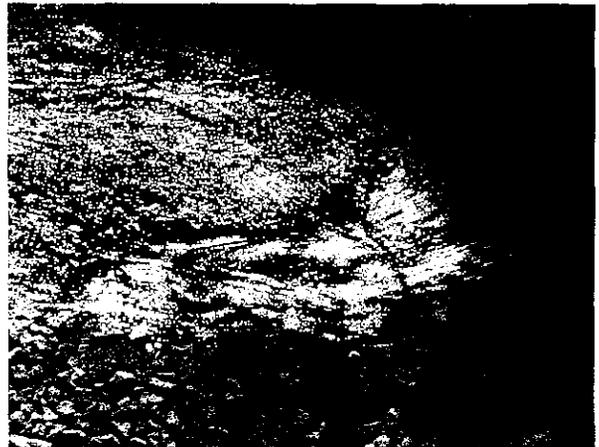


Figure 4 – Sediment trap has become choked with sediment and should be excavated.

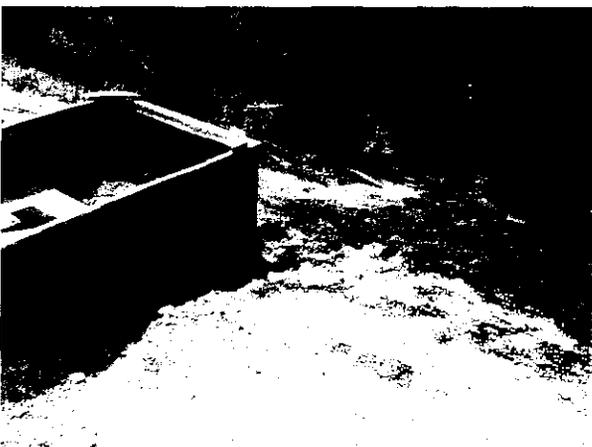


Figure 5 – Diversion berm has been eroded and is not functioning properly, allowing runoff to exit site.



Figure 6 – Near construction entrance concrete washout and runoff are combining and exiting site to roadside ditch.



Figure 7 – Channels forming at construction entrance allowing runoff to roadside ditches.



Figure 8 – Large amount of sediment entering ditch adjacent to site.



Figure 9 – Large amount of sediment entering ditch adjacent to site. Silt fencing in ditch is not functioning properly.



Figure 10 – Trash and debris should be removed from settling basin.

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