



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

July 11, 2011

RE: TRUMBULL COUNTY  
HOWLAND TOWNSHIP  
NPDES PERMIT #OHC000003  
OEPA PERMIT #3GC05302\*AG  
NRR MANUFACTURING FACILITY  
CONSTRUCTION STORM WATER

Mr. Greg Gamble  
Delphi Automotive Systems  
P.O. Box 431  
Warren, OH 44486

Dear Mr. Gamble:

On June 15, Ohio EPA conducted an inspection of the NRR Manufacturing Facility project located at 1265 N. River Road, Howland Township, Trumbull County. 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. 3GC05302\*AG. I was accompanied by Jake Gore of Trumbull County SWCD. We spoke with Dave Smaniotto of Bradenburg Demolition while there. The inspection documented the following:

- Not much earth disturbing activity has occurred yet. However, once earth disturbing activities begin throughout the site, please be sure to install silt fence as depicted in the Storm Water Pollution Prevention Plan (SWP3) with the specifications listed in the **Ohio Rainwater and Land Development Manual** (See Attached).
- The pre-existing inlets around the site have inadequate inlet protection. Simply stretching a piece of geotextile fabric under the grate is not an acceptable form of inlet protection. Also, the geotextile fabric is not the correct type. Again, refer to the **Ohio Rainwater and Land Development Manual** for acceptable ways to construct inlet protection and specifications on the type of geotextile material that should be used to prevent sediment from entering surface waters of the State (See Figures 1 & 2).

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. Also, please fax a copy of your most recent storm water inspection report to my attention at (330) 487-0769 or via e-mail at [timothy.mcparland@epa.state.oh.us](mailto:timothy.mcparland@epa.state.oh.us). Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1128.

Sincerely,

Tim McParland  
Assistant to the District Engineer  
Division of Surface Water

TM/mt

cc: Jake Gore, Trumbull County SWCD  
Dave Smaniotto, Bradenburg  
Howland Township Board of Trustees

ec: Chris Moody, Ohio EPA, NEDO, DSW



Figure 1: Geotextile fabric stretched under the grate is not an acceptable form of inlet protection.



Figure 2: The inlet is not protected very well.