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

May 3, 2011

RE: Wayne County
Baughman Twp.
BAU-TR-299-1.39 (Huprick Road)
Storm Water Construction

Baughman Township Trustees
c/o Ms. Carolyn S. Baer, Clerk
Baughman Twp.
6669 Coal Bank Rd.
Marshallville, OH 44645

Mr. Roger K. Terrill
Wayne County Engineer
3151 West Old Lincoln Way
Wooster, OH 44691

Dear Ms. Baer and Mr. Terrill:

On April 7, 2011, I performed a compliance inspection of storm water best management practices (BMPs) at the above referenced construction site. There was no one present on site at the time of inspection. Our records indicate that Baughman Township and Wayne County Engineer have obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC04796*AG for the Huprick Road improvement project.

My inspection revealed that maintenance is required for sediment controls. In particular, I noted the following:

- Inlet protection around catch basins requires repair or replacement. Holes were observed in the geotextile around certain inlets and the geotextile was not trenched and backfilled around other inlets. Either condition prevents runoff from ponding around the inlet so that sediment can settle. Please make repairs or replace the geotextile, as appropriate.

- Perimeter silt fence is in need of repair at the back of the cul-de-sac and in the vicinity of STA 80+00. The silt fence in these locations is down and must be re-erected or better supported to withstand flow. Please make the appropriate repairs.

These measures must be maintained until vegetation establishes to a growth density of at least 70%, i.e., the site has been re-stabilized.

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

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

Finally, I did not observe the installation of any post-construction best management practices as required by Part III.G.2.e of the NPDES permit, nor have I received a response to my letter dated February 11, 2011, requesting to meet with you to discuss this matter further. As such, I will refer this matter to our Central Office for enforcement consideration. As I have indicated to you previously, post-construction BMPs must be provided for all projects where 1 or more acre of land is disturbed.

Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your answer should be received **no later than May 17, 2011**.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,

Dan Bogoevski

Dan Bogoevski
District Engineer
Division of Surface Water

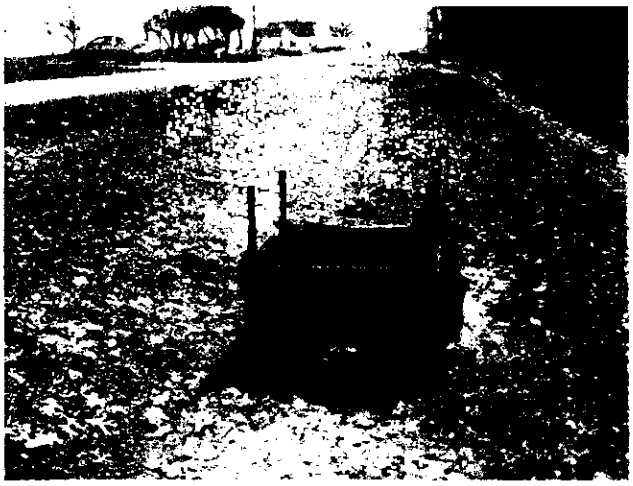
DB/mt

cc: David Robinson, Terra Valley Excavating
Rob Kastner, Wayne SWCD
Keith Amstutz, Project Engineer, Shaffer Johnston Lichtenwalter & Associates Inc.

ec: Mark Mann, Storm Water & Enforcement Programs Manager, Ohio EPA, CO, DSW

BAU-TR-299-1.39 (HUPRICK RD)
Baughman Township Wayne County

Photos Taken: April 7, 2011
By: Dan Bogoevski, DSW, NEDO



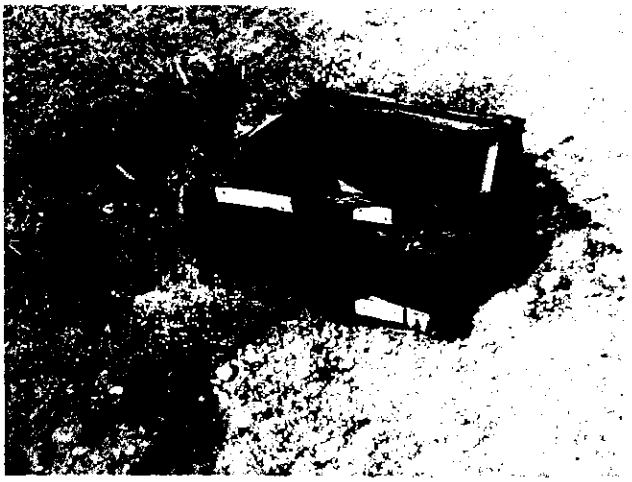


Fig 1 & 2. Storm drain inlet protection requires repair. In the photo on the left, a hole has developed in the geotextile allowing sediment-laden runoff to directly enter the catch basin. In the photo on the right, the geotextile has been lifted, limiting the effectiveness of this control measure.

Fig 3 (LEFT). Sediment has accumulated to the top of the silt fence around the cul-de-sac. Accumulated sediments must be removed to restore ponding capacity.

Fig 4 (RIGHT). Silt fence along the drainage channel is down in several spots and must be re-erected or reinforced to withstand the flow. Preceding the silt fence is one of the outfalls that will discharge post-construction runoff from the site. A post-construction BMP has not been provided.

Fig 5 & 6. In addition to the point source discharge shown in Figure 4, post-construction storm water runoff is also discharged at the two points shown in these photos. A post-construction BMP has not been installed for runoff discharged at these points either.

Fig 7. Swale along Huprick Road. These swales could easily be enhanced to meet post-construction requirements. As a redevelopment project, requirements could be met by enhancing a sufficient length of swales to treat 20% of the Water Quality Volume (WQv).