



Environmental  
Protection Agency

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

May 26, 2011

RE: WAYNE COUNTY  
CITY OF ORRVILLE  
CONSTRUCTION STORM WATER  
JM SMUCKER NORTH BUILDING  
PARKING RENOVATION

Mr. Bob Tucci, P.E.  
Bedell Tucci LLC  
254 West Market St.  
Akron, OH 44303

Dear Mr. Tucci:

On May 25, 2011, Ohio EPA received a request through you to comment on the Storm Water Pollution Prevention Plan (SWP3) for the above referenced project. The City of Orrville had requested that you seek this review. Our records indicate that storm water discharges from this project are authorized under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05462\*AG.

Ohio EPA comments are limited to storm water management issues related to runoff quality as required under the NPDES permit program. Calculation and treatment of the Water Quality Volume (WQv) was reviewed and found to be in compliance with the NPDES permit. Treatment for the required WQv is being provided by the bioretention cell. It should be noted that the underground detention structure on this site does not appear to serve a water quality function. Rather, it simply serves to address traditional storm water management concerns such as peak rate of discharge and flood control. As such, Ohio EPA did not review the ability of this structure to meet those local requirements.

I offer the following comments:

**General Comments**

- For clarity, a separate drawing should be provided to depict sediment and erosion controls that will be implemented during construction versus the permanent storm water management practices that will be installed to address post-construction runoff control. The bioretention cell and the underground detention structure are permanent practices and should not be confused with the silt fence, storm drain inlet protection and excavation dewatering practices that must be implemented while the site is under construction.

Mr. Bob Tucci, P.E.  
JM Smucker North Building Parking Renovation  
May 26, 2011  
Page2

- The construction sequence should provide more detail. The sequence should be a step-by-step procedure for implementation of the best management practices (BMPs) included in the SWP3 through the various stages of construction, e.g., the placement of planting soil in the bioretention cell shall not occur until disturbed areas within its drainage area have been re-stabilized.
- Ohio EPA issued NPDES permit coverage for this project on May 23, 2011, and this project was issued a Facility Permit #3GC05462\*AG. Please revise Sheet C203 accordingly. It still states that NPDES permit coverage is pending.
- The SWP3 is more than a set of construction drawings. Please assemble a binder that includes not only the construction drawings submitted to me for review, but a copy of the Director's Authorization Letter, the Notice of Intent (NOI), any Co-Permittee NOIs, contractor/subcontractor SWP3 acknowledgement certifications and a blank construction site inspection form to complete the SWP3. As inspection forms are completed, they should also be added to the binder. The binder must be kept on site at all times and updated as needed. Please refer to guidance available at [www.epa.gov/npdes/stormwater/construction](http://www.epa.gov/npdes/stormwater/construction) for further details.

#### **Comment on BMPs During Construction**

- No specifications have been provided for trench and excavation dewatering controls during the construction process. The use of these controls is expected given that the plan calls for excavation of not only the bioretention cell but an underground detention system. BMPs for controlling sediment in trench and excavation water include, but are not limited to: (a) the use of a dewatering bag, (b) dewatering through a sump pit, or (c) dewatering to a sediment trap. In addition to notes specifying the methods to be used, appropriate detail drawings must be added to the plan.

#### **Comments on Post-Construction BMPs**

- A prominent note should be added to the drawing depicting post-construction BMPs stating the planting soil shall not be placed in the bioretention cell until disturbed areas within its drainage area have been paved or otherwise stabilized. Please ensure that this issue is discussed with the contractor at the pre-construction meeting. The plan should provide provisional quantities of silt fence or other sediment barrier that can be placed upslope of the bioretention cell if necessary to prevent sediment migration to the cell once planting soil is placed within the cell.

Mr. Bob Tucci, P.E.  
JM Smucker North Building Parking Renovation  
May 26, 2011  
Page3

- Will CB1, CB2, CB7 and OS1 have solid manhole covers? If not, how will you ensure that runoff from the 0.22-acre drainage area enters the bioretention cell prior to flowing to the underground detention system?
- The long-term maintenance plan identifies the "owner" as the party responsible for long-term maintenance, but does not specify who the owner is. The plan must name the responsible party.

Please review my comments and revise the SWP3 as needed to address my concerns. Please provide me with a response letter and revised plan sheets before commencing construction.

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

Sincerely,



Dan Bogoevski  
District Engineer  
Division of Surface Water

DB/mt

cc: Rob Misutka, JM Smucker Co  
Lynn Snyder, Engineer, City of Orville  
David Handwerk, Mayor, City of Orrville  
Steve Wheeler, Public Service and Safety Director, City of Orrville