



Environmental  
Protection Agency

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

July 1, 2011

RE: WAYNE COUNTY  
CITY OF ORRVILLE  
CONSTRUCTION STORM WATER  
ORRVILLE HIGH SCHOOL

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

Dear Mr. Tucci:

On June 20, 2011, Ohio EPA received the Storm Water Pollution Prevention Plan (SWP3) for the above referenced project. The submittal consists of just four drawings, Sheets C110-C113 of the construction drawings. Our records indicate that Orrville City Schools has obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC05428\*AG.

After review of the plan, I offer the following comments:

**Erosion and Sediment Control**

- The plan calls for two sediment traps. The traps will discharge out onto what appears to be a paved drive along the east side of the existing building. Please ensure that this will not create a safety hazard or otherwise undesirable condition. It may be more prudent to call for sediment basins where the piped outlet can be directed to a catch basin or other suitable receiving receptacle rather than sediment traps that simply spill runoff out onto adjacent areas.
- Additional silt fence may be required along the drainage area perimeter south of Sediment Trap #1. It appears that runoff from a small area south of the trap will sheet flow away from the trap.
- Sheet C110 indicates that the detail drawing for the sediment basin is Detail 8 on Sheet C112. The detail drawing for the sediment basin is Detail 2 on Sheet C113. Please amend this note accordingly.
- Detail 2 on Sheet C113 indicates that the sediment basin will tie into an existing 12-inch storm sewer. Sheet C110 does not depict the location of this existing sewer. Rather, Sheet C110 shows a new storm sewer running through the temporary sediment basin (**NOTE:** No vertical profiles were provided to determine depth of pipe relative to sediment basin). Please provide an indication of the location of the existing 12-inch storm sewer and how the basin ties into it. Identify the location where this system ultimately discharges from the site.
- Once the storm sewer system becomes functional, the primary sediment control will be storm drain inlet protection. It will be critical that inlet protection is built and maintained per the specifications contained in the SWP3 in order to minimize the amount of sediment entering the underground storage system. A note on Sheet C110 indicates that the underground storage system will be thoroughly cleaned per manufacturer's

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instructions upon stabilization of upland areas. Sediments that accumulate within the system may not be discharged during the system cleaning process. Do manufacturer's instructions provide guidance on how to prevent sediments from discharging during the cleaning process?

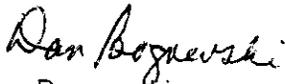
### Post-Construction Water Quality

- It is unclear if your calculation of the Water Quality Volume (WQv) required to be treated is correct. With this project being partly new development and partly re-development, the WQv calculation should tie into the total acreage disturbed by construction activity. The NOI indicates that this number is 13.40 acres. Information on Sheet C111 indicates that total site area is 17.22 acres, but calculations of the WQv are based on 2.27 acres of new development and 5.89 acres of redevelopment for a total of 8.16 acres disturbed by construction activity. Please clarify the total disturbance associated with this project so we can ensure that the amount of post-construction treatment provided meets requirements.
- The plan does not include a post-construction depiction of the site showing the location of post-construction BMPs and their respective drainage areas. Please provide this information as well as a depiction of the drainage area not receiving post-construction treatment. **NOTE:** The underground storage system is not a post-construction water quality practice.

Please provide me with a letter of response and include any amendments made to the SWP3 as a result of these comments. These concerns are to be addressed before construction activities at the site begin.

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

Sincerely,



Dan Bogoevski  
District Engineer  
Division of Surface Water

DB/mt

cc: Lynn Snyder, Engineer, Village of Orville  
David Handwerk, Mayor, City of Orrville  
Steve Wheeler, Public Service and Safety Director, City of Orrville