



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Erie County
Northpointe Baptist Church
Construction
Storm Water

August 24, 2010

Reverend Ralph W. Gilbert
Northpointe Baptist Church
P. O. Box 2336
Sandusky, Ohio 44870

Mr. Jason T. Heath
Project Manager/Master Electrician
BBF Builders
P. O. Box 939
Vilonia, Arkansas 72173

Dear Reverend Gilbert and Mr. Heath:

On June 21, 2010, Sarah Clement and Judson M. Delancey IV inspected Northpointe Baptist Church at 3702 Hayes Avenue, Perkins Township (photos taken). The purpose of the visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with construction activity, Facility ID No. 2GC02618*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Jason Heath, Project Manager, BBF Builders, was present to provide information on the project. Ohio EPA has no record of other permittees at this site.

Ohio EPA has not received a Co-Permittee Notice Of Intent (NOI) application for this project. This form is used by construction site operators, as defined in *Part VII.O* of the Construction General Permit, to become co-permittees with the initial permittee of a construction site. Please note that *Part II.A* of the Construction General Permit (or CGP) **requires all operators at a construction site to become co-permittees**. Mr. Heath of BBF Builders indicated that he is acting as general contractor and responsible for the day-to-day operation of the site. This letter serves to notify BBF Builders of these permitting obligations. Please submit a Co-Permittee NOI to this office or an explanation of why BBF Builders is not an "operator." Copies of the Co-Permittee NOI may be downloaded from our website at <http://www.epa.ohio.gov/dsw/storm/stormform.aspx>.

As a result of the inspection, we have the following comments:

1. At the time of inspection, construction at the site was ongoing. The building was being built and the detention pond was excavated. Approximately two acres of land were disturbed and barren.

2. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available. A general overview indicated some deficiencies, such as no concrete washout marked on the site map, total area of the site and the area of disturbance were not in the SWP3, and the site map did not reflect current site conditions. This information is a required component of the site's SWP3. *This is a violation of Part III.G of the permit.*
3. Inspection logs were not kept. Inspections must be conducted weekly and within 24 hours of a 0.5" rainfall. Inspections must include: disturbed areas, material storage areas, all sediment and erosion control measures, discharge locations, and all vehicle access points. Records must include: inspector name and qualifications, inspection date, observations, a certification that the facility is in compliance with the SWP3 and the permit, and identification of any incidents of non-compliance. The record and certification must be signed in accordance with Part V.G of the permit. *This is a violation of Part III.G.2.i of the permit.*
4. All temporary or permanent stabilization has not been established. For example, the large soil pile on the south side of the lot and the entire detention pond were not stabilized. The presence of rills and weed growth indicate the timeframe for stabilization may have been exceeded.

Permit Requires: Portions of the construction site which will be inactive for more than 21 days must have temporary stabilization initiated within the first seven days. Temporary stabilization is required prior to the onset of winter weather for ground that will be idle over winter. Permanent stabilization is required within seven days on any portion of the site that has reached final grade or will be idle for longer than one year. Soil stabilization practices shall be initiated within two (2) days on inactive, barren areas within 50 feet of a stream. Permanent seeding and mulching is required before construction activity is completed throughout the entire site. If seasonal conditions prohibit the establishment of vegetative cover, other means such as mulching and matting, must still be used and maintained until more permanent methods can be implemented. *Failure to do so is a violation of Part III.G.2.b.i of the permit.* At a minimum, temporary stabilization must be applied to all bare idle areas of the site.

5. Staff observed collapsed silt fence along the north side of the lot. *Permit Requires:* All control practices shall be maintained and repaired as needed to assure continued performance of their intended function. *This is a violation of Part III.G.2.h of your permit.* For more information on the correct installation and maintenance techniques for these practices, please see the *Rainwater and Land Development Manual.*

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6. Staff observed concrete washout on the south side of the lot. It is **prohibited** to pour out onto the ground or into a storm water conveyance any solvents, paints, stains, gasoline, diesel fuel, used motor oil, hydraulic fluid, antifreeze, cement curing compounds, and other such solid or hazardous wastes. It should be emphasized to on-site contractors that **any rinse waters** of such material are also prohibited from being placed where they may enter drainage ways. Washout of cement trucks should occur in a diked, designated area, away from any conveyance channel. *Please see Parts III.G.2.g.i and III.G.2.g.iii of the permit.*
7. The permit requires that post-construction Best Management Practices (BMPs) are installed during construction to control pollutants in the storm water discharges that will occur after construction has concluded. Such practices may include, but are not limited to: storm water extended detention structures; retention structures; water quality swales; and bioretention areas.

Within 10 days of the date on this letter, please submit to this office **written notification** as to the reasons for the above mentioned comments as well as the actions taken or proposed to prevent any future violations. Your response should include the dates, either actual or proposed, for the completion of the actions. Please provide in writing a description of the post-construction BMPs that will be installed. Your reply shall include the type(s) of practices, the basis for their design, and their installation dates.

If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette Hablitzel, PE
Division of Surface Water
Storm Water Program

/cs

pc: DSW;NWDO File
Perkins Township Hall
John D. Farschman, P.E./P.S.
Erie County SWCD