



**Environmental
Protection Agency**

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

Re: Erie County
Son Rise Marina-Storage Building
Construction
Storm Water

August 24, 2010

Mr. Todd Hart
Sandusky Boat Storage LLC
4918 Milan Road
Sandusky, Ohio 44870

Dear Mr. Hart:

On June 21, Sarah Clement and Judson M. Delancey IV inspected Son Rise Marina-Storage Building at 1403 First Street, Sandusky (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. 2GC02631*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Todd Sparks, Field Superintendent, for Janotta & Herner, Inc. was present to provide information on the project. Ohio EPA has no record of other permittees for this site.

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 had been constructed and the land had been excavated. Approximately 1.5 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 the fuel storage area was not shown on the site map, the site map had no dates showing grading activities, and the total area of the site, as well as the area of disturbance, was not shown on the SWP3. 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 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. Storm drain inlet protection had been incorrectly installed. A geotextile placed under the storm sewer grate is not an accepted control measure. Inlet protection was sagging and ripped. *Permit Requires:* All erosion and sediment control practices used to meet the conditions of this permit should meet the standards and specifications of the current edition of Ohio's *Rainwater and Land Development Manual* (ODNR) or other standards acceptable to Ohio EPA. *This is a violation of Part III.G.2.d.iv of the permit.* Proper inlet protection must be installed.

Pre-fabricated inlet protection products are available for both yard and curb inlets. They may decrease labor costs, tend to have less installation error, and can be re-usable. Please check with our office on the acceptability of individual products.

5. All temporary or permanent stabilization has not been established. For example, the soil pile on the west side of the lot and the ground along the north and south sides of the building were not stabilized. The presence of rills and amount of weed growth indicate the time frame 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 seeding with mulch must be applied to all bare areas that will be idle for 21 days or more.

6. Staff observed sediment tracking in the east parking lot. *Permit Requires:* All off-site vehicle tracking of sediments and dust generation shall be minimized.
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.

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

Sincerely,



Lynette Hablitzel, PE
Division of Surface Water
Storm Water Program

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pc: ~~DSW-NWDO:File~~
Kathryn McKillips, P.E., Deputy City Engineer, City of Sandusky
Todd Sparks, Field Superintendent, Janotta & Herner Inc.
Bob Herbst, Herbst Excavating LLC