



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

Re: Erie County
Two Rivers Condominiums
Construction
Storm Water

July 23, 2009

Mr. James Murray
Mr. Jim Seitz
Two Rivers Condominiums
111 Shoreline Drive,
Sandusky, Ohio 44870

Dear Sirs:

On July 13, 2009, Lynette Hablitzel and I inspected the Two Rivers Condominiums Phases 1 and 2 located at the north terminus of Marina Drive, Huron (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 (Construction General Permit), Facility ID Nos. 2GC01506 and 2GC01666. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Ohio EPA has no record of other permittees for this site.

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

1. At the time of the inspection, the site was inactive. There was a model home that was completed in Phase 1 of the project. Another home was completed in the second phase. Due to the absence of construction personnel or a trailer, the Storm Water Pollution Prevention Plan and inspections logs were not reviewed.
2. The curb inlet protection had been improperly installed. The geotextile had been wrapped under the grate. Yard inlet protection in Phase 1 had been installed incorrectly. There was no lateral support and stakes were smaller than 2 x 4. *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. of the permit.* Proper inlet protection will need to be installed if any additional earthwork is performed onsite, including individual home construction. Sediment settling ponds may still be required to serve construction activities in Phases 1 and 2.

Mr. James Murray
Mr. Jim Seitz
July 23, 2009
Page Two

3. The right of way appeared to have been seeded. Seeding and matting had also been applied to the west of Phase 2 on the bank of Mud Brook. Phase 1 had some bare areas that need to be reseeded and stabilized. At the end of the cul-de-sac in Phase 2, there was also some bare areas to the west that need reseeded and stabilized. There was a larger area of bare ground to the northwest of the finished home in Phase 2. *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. Temporary stabilization is required prior to the onset of winter weather for ground that will be idle over winter. Permanent stabilization is required within 7 days on any portion of the site that has reached final grade or will be idle for longer than 1 year. Soil stabilization practices shall be initiated within two (2) days on inactive, barren areas within 50 feet of a stream. In addition, disturbed areas in residential subdivisions must be stabilized at least 7 days prior to transfer of permit coverage for the individual lot(s). 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. I recommend that all inactive, unstable areas be mulched (straw at 2 tons/acre) until weather conditions are more favorable for temporary or permanent seeding. Due to the slope, temporary erosion control blankets are required when revegetating the banks along Mud Brook.*

4. **Post-Construction Storm Water Management** - Permanent structural post-construction Best Management Practices (BMPs) must be installed to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv shall be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. Drain times shall meet those in Table 2 of the permit. It appeared that the storm sewer system had been installed along the northern portion of the site, but no provisions for post construction storm water management facilities were observed. *This is a violation of Part III.G.2.e. of the permit.*

Within 10 days of the date on this letter, please submit to this office **written notification** as to 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 as well as those portions of the site's Storm Water Pollution Prevention Plan which demonstrate compliance with the post construction storm water management requirements of the permit. The latter would include a site map delineating the drainage area and location of each post construction control, the rationale for each control, and any detail drawings and water quality design calculations.

Mr. James Murray
Mr. Jim Seitz
July 23, 2009
Page Three

If there are any questions, please contact me at (419) 373-3085.

Sincerely,

A handwritten signature in cursive script that reads "Korey Sarven".

Korey Sarven
Division of Surface Water

/cs

pc: DSW, NWDO File
Andrew White, City Manager