



**Environmental  
Protection Agency**

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

Re: Hancock County  
ADM Fostoria  
Construction  
Storm Water

August 26, 2010

Mr. Mike Kuntz  
Archer Daniels Midland Company  
608 Findlay Road  
Fostoria, Ohio 44830

Dear Mr. Kuntz:

On August 11, 2010, Judson M. Delancey IV inspected the ADM Fostoria site on Findlay Road in Fostoria. 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. 2GC02465\*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Nate Johnson, Myers & Sons Inc., was present to provide information on the project. Ohio EPA has no record of other permittees at 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. Initial grubbing was taking place. Approximately 4.6 acres of land were disturbed and barren.
2. Inspection logs were not available on site. 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 identify 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.*
3. Staff noted that all of the joints in the silt fence were improperly installed. The stakes were not twisted together before installation with geotextile wrapped around both posts to create secure joints in the fence line. *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.* Silt fence must be properly installed.

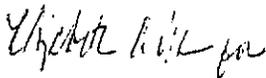
Mr. Mike Kuntz  
August 26, 2010  
Page 2

4. A detention pond was being excavated. *Permit Requires:* Concentrated runoff and runoff from drainage areas which exceed the design capacity of silt fence (over 0.5 acres per 100 ft. of silt fence) or inlet protection shall pass through a sediment settling pond. Also, common drainage locations serving an area with 10 acres or more disturbed at one time must have a sediment settling pond until final stabilization of the site. To qualify as a sediment settling pond, structures must meet the following specifications: a dewatering zone sized at 67 cubic yards per total contributing drainage acre; dewatering depth less than or equal to 5 ft. (optimal depths are between 3 to 5 ft.); for ponds serving 5 acres or more, the dewatering zone shall have a minimum 48 hr. drain time; a sediment storage zone sized at 1000 c.f. per disturbed acre; and the distance between inlets and the outlet at least 2:1 length:width ratio. *Please see Part III.G.2.d.ii. of the permit.* Please submit written verification from your consulting engineer or qualified inspector that the pond meets these design criteria.

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 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. Your reply shall include the type(s) of practices and the basis for their design.

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

Sincerely,



Lynette Hablitzel, P.E.  
Division of Surface Water  
Storm Water Program

//lr

pc: ~~DSW-NWDO~~File  
Nate Johnson, Myers & Sons Inc.  
Dan Thorton, PE, Consulting Engineer City of Fostoria