



Environmental
Protection Agency

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

Re: Hancock County
Donnell Middle School
Construction
Storm Water

June 29, 2011

Mr. Dean Wittwer
Findlay City Schools
1219 West Main Cross Street
Findlay, Ohio 45839

Mr. Kevin Hartman
Charles Construction Services, Inc.
P.O. Box 1546
Findlay, Ohio 45839

Dear Mr. Wittwer & Mr. Hartman:

On May 17, 2011, Lynette Hablitzel, Brian McGlown, and I inspected the Donnell Middle School construction site at 301 Baldwin Avenue, Findlay. The purpose of our 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. 2GC02849*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Brad Lackey, with Jackson Geothermal, was onsite to provide information. Lynette also spoke with Rob Craft, Jackson Geothermal, by phone.

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

1. At the time of inspection, construction at the site was ongoing. A geothermal system was being installed. Once the geothermal system is installed, this area will be covered in stone to serve as contractor parking and laydown area. Building construction will then commence to the west of the laydown area. Approximately 1 acre of land was disturbed and barren.
2. The Storm Water Pollution Prevention Plan (SWP3) and inspection logs were not onsite. *This is a violation of Part III.C.2 of the permit.* The SWP3, including a copy of inspection logs, must be available onsite during working hours. 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.

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3. A stone construction entrance had been installed. Sediment tracking was not observed.
4. Silt fence had been installed around the site's perimeter. Some sections of fabric had fallen. *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 the permit.* This must be fixed as soon as possible.
5. Topsoil had been placed in a stockpile parallel to Lime Street. As construction continues, please keep the requirements for soil stabilization in mind. *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. 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. *Please see Part III.G.2.b.i. of the permit.* I recommend applying temporary seed and a cover of mulch to the stockpile.
6. Water for purging the geothermal system will pass through a filter and be used to fill the pipes. There will be no discharge at this time. As activities continue, please keep in mind the permit requirements related to non-storm water discharges under Part I.B.4. (Prohibition on non-storm water discharges), Part III.G.2.g.i. (Non-sediment pollutant controls) and Part III.G.2.g.iii. (Trench and ground water control).

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 future violations. Your response should include the dates, either actual or proposed, for the completion of the actions. Please submit the information in the Storm Water Pollution Prevention Plan (SWP3) that demonstrates how the post-construction storm water management requirement will be met. Your reply should include a statement about the type(s) of BMPs implemented, a site map showing the location of each practice, a delineation of its tributary drainage area and its size, and the basis for its design. For each control include: the calculations of the Water Quality Volume (WQv), and a detail drawing of the structure with relevant elevations, stage-storage tables, and release rate calculations. Your reply must address how the Post-Construction requirement will be met for all disturbed areas.

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If there are any questions, please contact me at (419) 373-3036.

Sincerely,

A handwritten signature in black ink, appearing to read "Judson M. Delancey IV". The signature is fluid and cursive, with a large initial "J" and "M".

Judson M. Delancey IV
Division of Surface Water
Storm Water Program

/cs

pc: DSW, NWDO File
Meghan Clement P.E., Interim Chief Engineer, City of Findlay