



Environmental
Protection Agency

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

Re: Hancock County
Findlay North Middle School
Redevelopment Project
Construction
Storm Water

June 3, 2011

Ms. Meghan Clement, P.E.
Interim Chief Engineer
City of Findlay
318 Dorney Plaza, Room 304
Findlay, Ohio 45840

Dear Ms. Clement:

On May 17, 2011, Lynette Hablitzel, Brian McGlown and I inspected the Findlay North Middle School Redevelopment Project at 1501 North Main Street, 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. 2GC02811*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111.

While no one was present at the time of our visit, we did speak with Rick Hutton, Project Superintendent with Alvada Construction, who was working on the adjacent Glenwood Middle School Site. The two projects are related and are on the same parcel of land. According to Mr. Hutton, the Findlay North Middle School Redevelopment was the demolition and remediation of the former Trinity DIFCO/ Differential Car Company site. When this is complete, portions of the site will be part of the construction of the new Glenwood Middle School, including the location of the permanent storm pond.

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 (CGP), to become co-permittees with the initial permittee of a construction site. Please note that Part II.A of the CGP **requires all operators at a construction site to become co-permittees**. Please send a Co-Permittee NOI to this office or an explanation of why one is not needed. Copies of the Co-Permittee NOI may be downloaded from our website at <http://epa.ohio.gov/dsw/stormform.aspx>.

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

1. At the time of inspection, equipment was present but the site was inactive. According to Alvada Construction demolition/foundation removal had occurred, fill had been brought in, and some of the rough grading had been done. Approximately 4 acres of land were disturbed and barren.

2. Since there was no one present at the site during our visit, I was unable to review the Storm Water Pollution Prevention Plan (SWP3) and inspection logs.
3. Silt fence was installed around the project's perimeter. *Permit Requires:* The maximum drainage area behind silt fence is:

Drainage Area for 100 Lineal Feet of Silt Fence	Range of Slope
0.5 acres	<2%
0.25 acres	≥2% but <20%
0.125 acres	≥20% but <50%

I recommend that a sediment pond be constructed to reduce the impact of sediment-laden runoff. Failure to provide the appropriate settling pond prior to this stage of development will be noted as a permit violation.

4. I observed collapsed silt fencing throughout the entire site. Sediment and erosion controls should be inspected and maintained on a weekly basis.
5. **Post-Construction Storm Water Management** – Please be aware that the SWP3 must contain a description of the post-construction Best Management Practices (BMPs) that will be installed during construction, including detail drawings, and the rationale for their selection. The rationale must address the anticipated impacts on the receiving stream's channel and flood plain morphology, hydrology, and water quality. Maintenance plans shall be provided by the permittee to the post-construction operator upon completion of construction activities.

Post-construction practices shall either ensure a 20% net reduction of the site's impervious area, provide treatment of at least 20% of the Water Quality Volume (WQv), or a combination of the two.

When revising the SWP3, please show for each control: the calculations of the WQv, a detail drawing of the structure with relevant elevations, stage-storage tables, and release rate calculations. Offsite drainage must be included when sizing the structure. Runoff coefficients must be based on those contained in Table 1 of the permit. If a weighted runoff coefficient is being used, include supporting calculations. The SWP3 must address how the Post-Construction requirement will be met for all disturbed areas, including those not draining to the ponds. Additional guidance on Ohio EPA's Post-Construction Storm Water Management requirements can be found in our online Q&A document at: <http://www.epa.ohio.gov/dsw/storm/CGP-PC-Q&A.html>. Maintenance plans shall be provided by the permittee to the post-construction operator upon completion of construction activities and included in the SWP3.

Ms. Meghan Clement, P.E.
June 3, 2011
Page Three

Please send written notification of what corrective measures you have taken as well as a copy of the site's SWP3 to this office within 10 days of the date on this letter. Your SWP3 must fulfill all of the requirements of Part III.G of your permit.

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

Sincerely,



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

/cs

pc: ~~DSW/NWDO File~~
NWDO Follow-up File