



**Environmental
Protection Agency**

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

Re: Lucas County
Big Ditch Improvement Project 2010
Construction
Storm Water

August 24, 2010

Mr. Paul Roman, PE
Director of Public Service
City of Oregon
5330 Seaman Road
Oregon, Ohio 43616

Mr. David Riddell
Davey Resource Group
1500N. Mantua Street
Kent, Ohio 44240

Ms. Carolyn Nowakowski
Hanks Plumbing & Heating Company, Inc.
2000 The Bluffs
Toledo, Ohio 43615

Dear Mr. Roman, Mr. Riddell and Ms. Nowakowski:

On August 3, 2010, Sarah Clement and I inspected the Big Ditch Improvement Project 2010 at Oregon. The purpose of my 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. 2 GC02658. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Henry (Chip) Nowakowski, Hank's Plumbing & Heating Co. (a.k.a. hph) was present to provide information on the project.

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

1. *At the time of inspection, construction at the site was ongoing. While the entire project spans an area along Stadium Road from Seaman to Bayshore, earthwork at the time was limited to South Shore Park. A headwall had been installed on the lake side of Bayshore Drive. Piling had been placed to isolate that work area from the lake. Grading and excavating of the two new channels was occurring on the south side of Bayshore Drive, with plans to install the culvert under Bayshore Drive the following week.*

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2. The Storm Water Pollution Prevention Plan (SWP3) was not onsite. This is a violation of Part III.C.2. of the permit. Inspection logs were not kept. This is a violation of Part III. G.2.i. of the permit.

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.

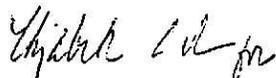
3. With this project, there will be several soil spoil areas located offsite. I recommend that one site be worked at a time and then stabilized before using another location, to limit the amount of soil exposed to precipitation. Please keep in mind as construction progresses, that portions of the construction 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 seven (7) days on any portion of the site that has reached final grade or will be idle for longer than one (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.
4. The disturbed areas appeared to be self contained (not connected to storm sewers or waters of the state) at the time of the inspection. Future sediment controls planned for the project were the use of berms in the new channel to keep the lake water from backing into the work area and pumping the runoff that accumulated in the new channel into a metal tank to allow settling. As construction progresses, please keep in mind the permit requirements regarding controls for groundwater and trench dewatering as well as for sediment settling ponds. If the area behind the berm is to function as a sediment settling pond, I recommend allowing the water to settle in place as well as using a floating suction line on the pump to dewater from the top of the water column. If turbidity remains an issue, chitosan logs may be placed in the influent to further promote settling.

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Within seven (7) 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.

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

Sincerely,



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

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pc: DSW-NWDO File