



**Environmental
Protection Agency**

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

Re: Lucas County
Edgebrook
Construction
Storm Water

December 30, 2010

Mr. David Schmitt
Edgebrook Development
5135 Main Street
Sylvania, Ohio 43560

Dear Mr. Schmitt:

On November 23, 2010, I inspected Edgebrook at 2431 North Holland-Sylvania, Toledo (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, Facility ID No. 2GC01481*AG. Ohio EPA has no record of other permittees for this project. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111.

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

1. At the time of inspection, Plat 1 was mostly complete with no on-lot construction. In Plat 2, the street from Edgebrook to Royce Road had been completed, as well as a portion of Brookridge, which ended on the west side of Hill Ditch. Only building on individual lots was occurring in Plat 2.
2. Due to the absence of personnel or a construction trailer, the Storm Water Pollution Prevention Plans (SWP3) and inspection logs were not available for review.
3. Curb inlets along the road lacked inlet protection, but appeared to drain into an extended detention pond. The pond discharged into Hill Ditch. Until the SWP3 is reviewed, I cannot verify whether the extended detention pond is of sufficient depth, volume, and configuration to fulfill the requirements of a sediment settling basin. *Permit Requires:* Settling ponds must be sized at 67 cubic yards per acre of total contributing drainage area, having a 2:1 length to width ratio between inlets and the outlet, and have a maximum depth of five (5) feet.

Please see part III.G.2.d.ii. of the permit. It will be necessary to modify the pond if it does not already meet these criteria.

4. *In Plat 2, there were no sediment controls along Hill Ditch. Permit Requires: Structural practices shall be implemented to protect adjacent streams. This is a violation of Part III.G.2.d.v. of the permit. A setback of 25 ft. from the ordinary high water mark is recommended to be maintained in its natural state as a permanent buffer. I also recommend installing a diversion berm and silt fence barrier adjacent to Hill Ditch. Diversion berms must route runoff into a sediment settling pond.*
5. *Two homes were under construction in Plat 2 (6038 Brookridge and what appeared to be 2413 Royce). They did not appear to have stable construction entrances; however, vehicles were parked on the road. A stable construction entrance must be provided on each lot before vehicles are allowed to access the property. Please see Part III.G.2.g.ii. of the permit.*
6. *Other than the two lots, the remainder of Plat 2 was idle. No method of stabilization had been applied to the soil. 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 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 surface water. In addition, disturbed areas in residential subdivisions must be stabilized at least seven (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. All areas not being actively worked must be stabilized as per the requirements of the permit. I recommend that all inactive, unstable areas be mulched (straw at 2 tons/acre) until the spring, when conditions are more favorable for temporary seeding.*

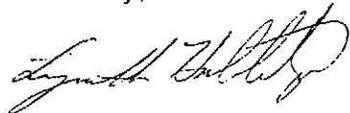
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7. It was unclear how the post construction storm water management requirements will be met, especially for the rear of the lots in Plat 2 abutting Hill Ditch. Under the conditions of the permit, Edgebrook is required to have one or more of the permanent structural post-construction Best Management Practices (BMPs) listed in Table 2 of the permit to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards listed in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv is to be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. Drain times must meet those in Table 2 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. Please assess the constructed extended detention pond that appears to be serving Plat 2 and include verification that it currently meets the design requirements of the permit for a sediment settling pond. Please submit the information in your 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), 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.

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

Sincerely,



Lynette Hablitzel, P.E.
Division of Surface Water

/llr

pc: DSW-NWDO File

ec: Patekka Pope Bannister, City of Toledo Division of Environmental Services,
Patekka.Bannister@toledo.oh.gov