



Environmental
Protection Agency

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

Re: Lucas County
Edison Place Plat 2
Construction
Storm Water

August 5, 2010

Ms. Kim Cutcher
United North
3106 Lagrange Street
Toledo, Ohio 43608

Dear Ms. Cutcher:

On July 14, 2010, Sarah Clement and Eric Budge inspected Edison Place Plat 2 on the southwest side of Bassett Avenue and southeast of Edison Street in Toledo. The purpose of the inspection 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 GC02443*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Randy Johns, from Clauster Excavating, was present to provide information on the project.

Ohio EPA has not received a Co-Permittee Notice of Intent (NOI) for this project. This form is used by construction site operators, as defined in Part VII.O. of the Construction General Permit, to become co-permittees with the initial permittee of a construction site. Please note that Part II.A. of the Construction General Permit (CGP) **requires all operators at a construction site to become co-permittees**. If you have a contractor responsible for the day to day operation of the site, implementing the Storm Water Pollution Prevention Plan, they must obtain permit coverage. Copies of the Co-Permittee NOI may be downloaded from our website:

<http://www.epa.ohio.gov/dsw/storm/stormform.aspx>.

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

1. At the time of the inspection the site was active. Workers were on site installing the storm sewer system.
2. The Storm Water Pollution Prevention Plan (SWP3) was not on site. *This is a violation of Part III.C.2. of the permit*

3. Inspection logs were not kept. Inspections must be conducted weekly and within 24 hours of a 0.5 inch or greater 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's name and qualifications, inspection date, observations, 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.*
4. There was no inlet protection on the storm drain inlets next to Edison Street. *Permit Requires:* Practices shall minimize sediment laden water from entering active storm drain systems. *This is a violation of Part III.G.2.d.iv. of the permit.*
5. A construction entrance is needed where vehicles access the site from Edison Street. Please refer to Ohio's *Rainwater and Land Development Manual* (ODNR) for the standards and specifications of an acceptable construction entrance. Sediment on Edison Street indicates there is tracking from the site. *This is a violation of Part III.G.2.g.ii. of the permit.*
6. Please keep in mind the permit requirements for post-construction storm water management. There is an Edison Place, with a Construction General Permit, that is 5.7 acres. This site combined with Edison Place Plat 2 creates a total common plan of development greater than 5 acres. For a construction site over 5 acres, the permit requires that permanent structural post-construction Best Management Practices (BMPs) are installed to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv shall be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. Drain times shall meet those in Table 2 of the permit.

Please send written notification of what corrective measures you have taken within 10 days of the date on this letter. Your response should include dates, either actual or proposed, for the completion of the actions. Please also include a written response describing what post-construction storm water management practices are being/will be implemented on the site, including the type(s) of practices and the basis for their design.

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

Sincerely,



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

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pc: ~~DSW-NWDO:File~~
Patekka Bannister, Storm Water Coordinator