



**Environmental
Protection Agency**

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

Re: Lucas County
HEN/LUC-24-10.42/0.00 Part 1
HEN 24-10.43 Part 2
Construction
Storm Water

October 1, 2010

Mr. Mike Gramza
ODOT District 2
317 East Poe Road
Bowling Green, Ohio 43402

Mr. Larry Winkelman
Miller Bros Construction
1613 South Defiance
P.O Box 30
Archbold, Ohio 43502

Dear Sirs:

On August 2, 2010, Ohio EPA received a complaint about a lack of sediment and erosion controls on the new U.S. 24 project. On August 4 and 12, 2010, I inspected HEN/LUC-24-10.42/0.00 Part 1 HEN 24-10.43 Part 2 in Waterville and Providence Townships. 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. 2GC02270. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. At the time of the August 12, 2010, visit, I met with ODOT representatives Dan Meyer and T.J. Zura; and Steve Hamit, of KCI Associates. Photos were taken during the August 4, 2010, visit and copies are attached to this letter. Copies of inspection notes from both dates are also included.

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

1. The project is the new alignment of U.S. 24 and expansion into a 4 lane divided highway. The Waterville and Providence Township portions of this project are approximately 6.5 miles of the 10.2 mile (684 acre) project. At the time of both visits, the new U.S. 24 and related ramps and overpasses were in various stages of construction. Most of the roadside ditches had been rough cut/graded and had temporary or permanent stabilization applied.

Mr. Mike Gramza
Mr. Larry Winkelman
October 1, 2010
Page 2

2. During my August 12, 2010 visit, the Storm Water Pollution Prevention Plan (SWP3) was available. A cursory review found that the site map reflected the current location of controls and included delineated drainage watersheds with their acreages. Inspection logs were not reviewed at the time.
3. The site map with the inspector's notes indicated that sediment settling basins or traps were to be installed where the project discharged to receiving waters. Between my August 4th and 12th observations, there appeared to be a sediment control at each point where the project intersected a water of the state. Most of the site was served by sediment settling basins, including a large one located between Heller and Bailey Roads which serves 60 acres. Chitisan had been placed in some of the sediment basin riser pipes to aid in settling. While its use is acceptable, caution must be exercised in its placement to insure that adequate volume is available for sediment settling prior to the discharge entering waters of the state.
4. Silt fence ditch checks had been installed upstream of sediment settling ponds. The checks were "u" shaped across the top, with the fabric entrenched. I did not see erosion around or scour holes after the checks. On August 4, 2010, I did notice at the new Jeffers Road overpass, on the east side of the approach from the north that the silt fence ditch checks were in need of repair. At least two fences were down. *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.*
5. On August 12, 2010, where the new U.S. 24 crossed Millers Ditch On the west side of the road, the stream had been rerouted along the side of the road. As was discussed at that time, the road bank needed to be reseeded and silt fence reinstalled along the stream. *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.*
6. Storm drain inlet protection had been installed and was a product called Vertipro. Vertipro consisted of a geotextile connected to a metal frame which was attached to the concrete portion of the catch basin. The geotextile was somewhat sheer – standing on one side of the structure I could look through two panels and see the ground on the opposite side of the catch basin. This fabric did not appear to meet permit objectives. As most of the inlets were tributary to sediment settling ponds, this was not an issue. However, for those inlets that are not tributary to a sediment settling pond, proper inlet protection must be installed.

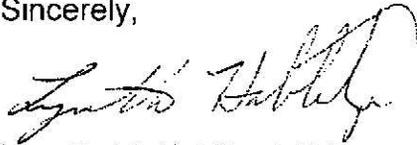
Mr. Mike Gramza
Mr. Larry Winkelman
October 1, 2010
Page 3

7. On August 4, 2010, a construction entrance was absent on the east side where the new U.S 24 crossed Manore Road, at Box Road, and at Heller Road. I observed sediment tracking at Manore and Heller Roads. *This is a violation of Part III.G.2.g.ii. of the permit.*
8. The majority of the project areas that were idle appeared to have grass cover or had been seeded and mulched.

Within seven (7) days of the date on this letter, please submit to this office **written notification** addressing Items 4 through 7, describing 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

/llr

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