



**Environmental
Protection Agency**

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

Re: Lucas County
Highland Elementary
Construction
Storm Water

August 9, 2010

Alan Bacho
Sylvania School District
6850 Monroe Street
Sylvania, Ohio 43560

Steve Jackson
The Garrison Company
32871 Middlebelt Road, Suite 100
Farmington Hills, Michigan 48334

Dear Sirs:

On June 21, 2010, Sarah Clement and Judson Delancey inspected Highland Elementary at 7720 Erie Street in Sylvania, Ohio (pictures 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. 2 GC02542*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Steve Jackson, Director of Field Operations for The Garrison Company, was present to provide information on the project.

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

1. At the time of the inspection, construction on the site was ongoing. The exterior of the addition to the existing school had been completed. The construction of the basketball courts and the playground had not begun.
2. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available.
3. Inspection logs were not kept. Inspections must be conducted weekly and within 24 hours of a 0.5 inch 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, a certification that the facility is in compliance with the SWP3 and the permit, and identify any instances 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.*

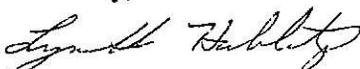
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4. The west storm sewer inlet on the Erie Street (south) side of the building did not have any inlet protection. *Permit Requires:* Practices shall minimize sediment laden water entering active storm drains systems unless they drain to a sediment settling pond. *This is a violation of Part III.G.2.d.iv. of the permit.*
5. The inlet protection on the northern storm drain on the west side of the building was installed incorrectly. *Permit Requires:* All sediment and erosion control practices used to meet the conditions of the permit should meet the standards and specifications of the current edition of Ohio's *Rainwater and Land Development Manual* (ODNR) or other standards acceptable to the Ohio EPA. *This is a violation of Part III.G.2. of the permit.*
6. The inlet protection on the southern storm drain on the west side of the building was in disrepair. *Permit Requires:* All sediment and erosion 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.*
7. All temporary or permanent stabilization has not been established. The presence of bare, weathered soil along the east side of the building indicates that the timeframe for stabilization may have been exceeded. *Permit Requires:* Portions of the construction site which will be inactive for longer than 21 days must have temporary stabilization initiated within the first seven days. Permanent stabilization is required within seven days on any portion of the site that has reached final grade or will be idle for longer than one year. 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.*

Please send written notification of what corrective measures you have taken within 10 days of the date on this letter. 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 Hablitzel, P.E.
Division of Surface Water
Storm Water Program
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Pc [REDACTED]

Jeffery Ballmer, Service Director, City of Sylvania