



State of Ohio Environmental Protection Agency

Northwest District Office

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TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Lucas County
Springfield New Athletic Facility (Albon Rd.)
Construction
Storm Water

May 6, 2009

Springfield Board of Education
Mr. Bob Moellenberg
Administration Offices
6900 Hall Street
Holland, Ohio 43528

And

Crestline Paving & Excavating
Mr. Jerry James
1913 Nebraska Avenue
Toledo, Ohio 43607

Dear Mr. Moellenberg and Mr. James:

On April 1, 2009, Ben Smith and I inspected Springfield Schools New Athletic Facility at 8033 Angola Road, Springfield Township (photos taken). The site currently operates under coverage of the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with construction activity, Facility ID No. 2 GC02093. 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, construction activity was not occurring. The soccer and ball fields appeared mostly complete and stabilized. Silt fence was in place along the southern end of Soccer Field #2 near the south end of the facility.
2. Ground south of the entrance off Albon Road and ground to the south of the athletic fields had not been stabilized. *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 7 days on any portion of the site that has reached final grade or will be idle for longer than 1 year. Soil stabilization practices shall be initiated within two (2) days on inactive, barren areas within 50 feet of a stream.



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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. *This is a violation of Part III.G.2.b.i. of the permit.*

3. Post Construction Storm Water Management – Looking at the revised SWP3 submitted September 2, 2008, sufficient information was not included in the submittal to determine whether the proposed design will meet permit requirements. A retention pond with extended detention is shown as a post construction storm water management structure for the majority of the site. A rationale statement addressing the anticipated impacts on the receiving water's channel and floodplain morphology, hydrology, and water quality was not included. Drawing 8.5 of 19 stated the wet pool elevation is to be 645.8 ft., however, on Drawings 4 and 6 of 19, the invert elevation of the 3 inch diameter orifice on the WQv control was given as 644.38 ft. Please review the plans for consistency and provide the correct elevation. It was unclear which method from the permit was used to determine the runoff coefficient. Please provide supporting documentation showing this. Assuming a Water Quality volume (WQv) of 26,071 c.f. is correct, the extended detention volume (EDv) of 19,553 c.f. and the wet pool volume are acceptable. Please provide stage-storage tables, and release rate calculations and modeling as was previously requested. Outlet design calculations and modeling must demonstrate that the EDv is released over 24 hours, with no more than 50% of the required EDv being released in the first 8 hours. For more information about designing to meet the post construction storm water management requirements, please see ODNR's Rainwater and Land Development Manual (<http://www.dnr.state.oh.us/tabid/9186/default.aspx>) and Questions 20, 22, 23, and Appendix B of Ohio EPA's Post Construction Q&A Document (<http://www.epa.state.oh.us/dsw/storm/CGP-PC-Q&A.html#20>).

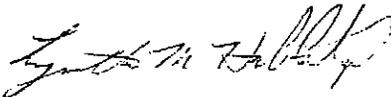
For the natural wetlands that are onsite, a hydrologic analysis was not included in the SWP3 revisions. The SWP3 did not contain details on the pre-development hydroperiods and hydrodynamics that support the wetlands and on how the permittee shall attempt to match them. The permittee shall assess whether their activity will adversely impact the wetlands' hydrologic flora and fauna. For more details on the Post Construction Storm Water Management requirements, *please refer to Part III.G.2.e. 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 as well as a those revised portions of the Storm Water Pollution Prevention Plan that demonstrate compliance with the Post Construction Storm Water Management portions of the permit.

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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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~~NWDO File~~

Brian Miller, P.E., Assistant Drainage Engineer, Lucas County Engineer
Jeff Grabarkiewicz, Lucas SWCD, Lucas County SWCD
Leslie Kohli, Springfield Township Administrator
Thomas R. Worline, P.E., T.R. Worline & Associates
Brian Swartz, U.S. Army Corps of Engineers
Rahel Babb, Ohio EPA – DSW, 401/Isolated Wetlands