



**Environmental
Protection Agency**

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

Re: Lucas County
Ottawa River K-8
Construction
Storm Water

August 25, 2010

Mr. John Gilliland
Toledo Public Schools
420 E Manhattan Blvd 114
Toledo, OH 43608

The Garrison Co
32871 Middlebelt
Ste 100
Farmington Hills, MI 48334

Dear Mr. Gilliland:

On July 8, 2010, Sarah Clement and Judson Delaney inspected the Ottawa River K-8 project at 4747 290th Street, Toledo. 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. 2GC02438*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Mike Hecimovich, Project Manager of The Garrison Co., was present to provide information on the project. Ohio EPA's records show that you are Co-Permittees on this project.

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

1. At the time of inspection, construction was ongoing. The building was being erected and the ground was at a rough grade. Approximately four acres of land were disturbed and barren.
2. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available. A general overview indicated some deficiencies, such as not being updated and the site map not showing the locations of the concrete washout area and fuel storage area. This information is a required component of the site's SWP3. *This is a violation of Part III.G of the permit.*
3. Inspection logs were not kept. Inspections must be conducted weekly and within 24 hours of a 0.5" 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 name and qualifications, inspection date, observations, a 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. No inlet protection had been installed on the storm sewer inlet in the northeast corner. Staff observed no retention or detention pond at this site. *Permit Requires:* Practices shall minimize sediment laden water entering active storm drain systems unless they drain to a sediment settling pond. *This is a violation of Part III.G.2.d.iv of your permit.* Proper inlet protection must be installed.
5. Staff observed that silt fence had collapsed in the south east corner and along the west side of the site. Also, the joints of the silt fence were not properly installed. Staff noted some tracking at the construction entrance on 108th Street. *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 your permit.* For more information on the correct installation and maintenance techniques for these practices, please see the *Rainwater and Land Development Manual*. The silt fence must be repaired and the construction entrance redressed with larger stone.
6. **Post-Construction Storm Water Management-** Please be aware that the SWP3 must contain a description of the post-construction Best Management Practices (BMPs) that will be installed during construction, including detail drawings, and the rationale for their selection. The rationale must address the anticipated impacts on the receiving stream's channel and floodplain morphology, hydrology, and water quality. Maintenance plans shall be provided by the permittee to the post-construction operator upon completion of construction activities.

Such practices may include, but are not limited to: storm water detention structures; retention structures; flow attenuation by use of open vegetated swales and natural depressions; and infiltration practices. The SWP3 shall include an explanation of the technical basis used to select the practices to control pollution where flows exceed pre-development levels. Velocity dissipation devices shall be placed at discharge locations and in channels to provide non-erosive flow velocity from the structure to a water course.

No post construction storm water management controls were evident. *This is a violation of Part III.G.2.e of the permit.*

Within **ten days** of the date on this letter, please submit to this office **written notification** as to the reasons for the above mentioned comments as well as 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 include a description of the post-construction BMPs that will be installed. Your reply shall include 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, PE
Division of Surface Water
Storm Water Program

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~~NWDO file~~

Follow up file

Patekka Bannister, City of Toledo, Division of Environmental Services