



**Environmental
Protection Agency**

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

Re: Lucas County
Riverside Elementary School
Construction
Storm Water

August 5, 2010

Mr. John Gilliland
420 East Manhattan Blvd 114
Toledo, Ohio 43608

Dear Mr. Gilliland:

On July 8, 2010, Sarah Clement and Judson Delancey inspected Riverside Elementary School at 500 Chicago Street in 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. 2 GC02409*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Guy Taylor, Superintendent for LGB, 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 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, we have the following comments:

1. At the time of the inspection, the site was active. The frame work and a majority of the exterior of the building had been completed. The water line and a portion of the storm sewer had been installed.
2. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available. A general overview indicated the SWP3 was not kept up to date with the ongoing construction. The SWP3 also did not depict where the fuel storage or concrete washout areas were located on the site. For Post Construction Storm Water Management, plans appeared to show the storm water flowing into three bioretention areas.
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.

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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 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.*

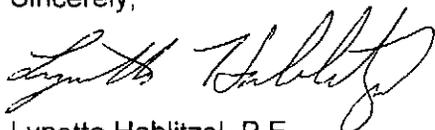
4. The storm water inlet on the Chicago Street side of the site, just northeast of the portion of Ontario Street that had been torn up, had been buried under dirt and debris. Inspectors were unable to determine if inlet protection had been installed. *Permit Requires:* Control practices shall minimize sediment laden water entering active storm drain systems. These controls must remain in place until the upslope area is stabilized. *This is a violation of Part III.G.2.d.i and Part III.G.2.d.iv. of the permit.* You must remove the sediment and make sure proper inlet protection is installed and maintained.
5. The disturbed land surrounding the building was bare weathered ground. At the time of the inspection, no erosion control measures had been implemented on the site. As construction continues, please keep in mind the permit requirements about temporary and permanent stabilization. *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 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 or matting, must still be used and maintained until more permanent methods can be implemented. *Please see Part III.G.2.b.i. of the permit.*
6. Inspectors observed collapsed filter fabric in the north corner of the site, southeast of Ontario Street, as well as along Chase 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 the permit.* Controls must be repaired.
7. The joints in the silt fence, for example on the northwest side of the site along Ontario Street, appeared to be incorrectly installed. The stakes were not twisted together before installation, with the geotextile wrapping around both posts to create secure joints in the fence line. *Permit Requires:* All erosion and sediment controls used to meet the conditions of this 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 Ohio EPA. *This is a violation of Part III.G.2. of the permit.* Joints must be correctly installed.

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.

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

Sincerely,



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

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Pc Follow-up File

~~NWDC File~~

Patekka Bannister, Storm Water Coordinator, City of Toledo