



2GC0262220100825

LUCAS STRANAHAN ELEMENTARY SCHOOL 2GC02622 2010/08/25 DELANCEY, JUDSON SYLVANIA



**Environmental
Protection Agency**

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

Re: Lucas County
Stranahan Elementary School
Construction
Storm Water

August 25, 2010

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

Mr. Mark Saldana, Superintendent
The Spieker Company
8350 Fremont Pike
Perrysburg, Ohio 43551

Dear Mr. Bacho and Mr. Saldana:

On June 21, 2010, Sarah Clement and Judson M. Delancey IV inspected Stranahan Elementary School at 3840 Holland Sylvania Road, Sylvania Township. 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. 2GC02622*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Mark Saldana was present to provide information on the project. The Ohio EPA has no record of other permittees at this site.

Ohio EPA has not received a Co-Permittee Notice of Intent (NOI) application 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 (or CGP) **requires all operators at a construction site to become co-permittees**. Mr. Saldana indicated that The Spieker Company is acting as general contractor and is responsible for the day-to-day operation of the site. This letter serves to notify The Spieker Company of these permitting obligations. Please submit to this office a Co-Permittee NOI or an explanation of why The Spieker Company is not an "operator." Copies of the Co-Permittee NOI may be downloaded from our website at:
<http://www.epa.ohio.gov/dsw/storm/stormform.aspx>.

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

1. At the time of inspection, construction at the site was ongoing. The ground work was mostly done with some finishing touches to complete. Three catch basins will be installed in front of the building. Approximately two (2) acres of land were disturbed and barren.
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" 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.d of the permit.*
4. There was tracking on Holland Sylvania Road. *Permit requires: Off-site vehicle tracking of sediments and dust generation shall be minimized. This is a violation of Part III.G.2.g.ii of the permit. We recommend redressing the construction entrance with additional stone to minimize tracking.*
5. The permit requires that post-construction Best Management Practices (BMPs) are installed during construction to control pollutants in the storm water discharges that will occur after construction has concluded. Such practices may include, but are not limited to: storm water extended detention structures; retention structures; water quality swales; and bioretention areas.

Within 10 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 completions of the actions. Please provide in writing a description of the post-construction BMPs that will be installed.

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Your reply shall include the type(s) of practices, the basis for their design, and their installation dates.

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: DSW:NWDO:File_1
Greg Huffman, Public Works Manager
Keith G. Earley, P. E., P. S., Lucas County Engineer
Jeff Grabarkiewicz, Lucas County SWCD