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| LUCAS | WHITMER HIGH SCHOOL STADIUM IMPROVEMENTS | 2GC02595 2010/08/25 | DELANCEY, JUDSON | TOLEDO |
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**Environmental
Protection Agency**

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

Re: Lucas County
Whitmer High School Stadium
Improvements
Construction
Storm Water

August 25, 2010

Mr. Dave Bringman
Washington Local School District
3505 West Lincolnshire Boulevard
Toledo, Ohio 43606

Mr. Mark Szozda, Superintendent
Willson Builders
5966 Heritage Court
Toledo, Ohio 43612

Dear Mr. Bringman and Mr. Szozda:

On July 22, 2010, Judson Delancey inspected Whitmer High School Stadium Improvements at 5700 Whitmer Drive, 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. 2GC02595*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Mark Szozda, Superintendent with Willson Builders, was present to provide information on the project. 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 permit requires all operators at a construction site to become co-permittees*. Mr. Szozda indicated that Willson Builders is acting as general contractor and responsible for the day-to-day operation of the site. This letter serves to notify Willson Builders of these permitting obligations. Please submit a Co-Permittee NOI to this office or an explanation of why Willson Builders 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 buildings and a majority of the roads were in place. All but one storm sewer was installed and tied in. Approximately 2.75 acres of land were disturbed and barren.
2. A Storm Water Pollution Prevention Plan (SWP3) had been developed and was available.
3. No inspection logs were 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. Storm drain inlet protection had not been installed on the four catch basins along Whitmer Dr. and on the catch basin on the north side of the site. Staff did not observe a 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 the permit.* I recommend that proper inlet protection be installed. Placing geotextile under the grate is not an accepted control measure.
5. Staff observed collapsed silt fence in the north east corner. *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.* For more information on the correct installation and maintenance techniques for these practices, please see the *Rainwater and Land Development Manual.*
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.

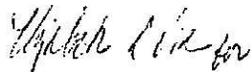
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Maintenance plans shall be provided by the permittee to the post-construction operator upon completion of construction activities. Such practices may include, but are not limited to: storm water detention structures; retention structures; flow attenuation 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 control practices. 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.

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, as well as a description of the post construction storm water management practices that will be implemented at the site. Your reply should include the type(s) of practices, the basis for their design, and installation dates.

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

Sincerely,



Lynette Hablitzel, PE
Division of Surface Water
Storm Water Program

/llr

pc: DSW-NWDO:File
Patekka Bannister, City of Toledo, Division of Environmental Services