



2GC0248120100729

MERCER IMACKINAW DEVELOPMENT

2GC02481 2010/07/29 CLEMENT, SARAH CELINA



**Environmental
Protection Agency**

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

Re: Mercer County
Mackinaw Development
Construction
Storm Water

July 29, 2010

Mr. Bob Hellmuth
RLH Partners, Inc.
7652 Sawmill Road #340
Dublin, Ohio 43601

Dear Mr. Hellmuth:

On June 30, 2010, Judson Delancey and I inspected Mackinaw Development on West Wayne Street in Celina (pictures taken). The purpose of our visit was to evaluate compliance of the site with your National Pollutant Discharge Elimination System (NPDES) permit for storm water discharge associated with construction activity, Facility ID No. 2 GC02481*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Tony Lange, from RCS Construction, 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 the 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, I have the following comments:

1. At the time of the inspection, the site was active. The buildings were erected and most of the exterior work had been completed. The storm drains had been installed and were connected to the city storm water system. Part of the waterline had been installed along the southern edge of the site. The retention pond in the northeast corner of the site had been constructed and was filled with water. The dirt to form the berms, that will be located on the east, south, and west sides of the site, was being stored in piles on the perimeter of the site. A stock pile of top soil was located in the southwest corner of the site.

2. No Storm Water Pollution Prevention Plan had been developed for the site. *This is a violation of Part III.A. of the permit.*
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. 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. There were no storm drain inlet protections on either of the two inlets in the parking lot. *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.
5. The joints of the silt fence appeared to be incorrectly installed. The stakes were not twisted together before installation, with geotextile wrapping around both posts to create secure joints in the fence line. *Permit Requires:* All erosion and sediment control practices 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.*
6. The bare areas and the stock pile to the south of the building, had no vegetative cover and appeared weathered. The walls of the retention pond in the northeast corner of the site also appeared weathered and there was weed growth. This could be an indication that the timeframe for stabilization may have been exceeded. *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 and 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.*

Mr. Bob Hellmuth
July 29, 2010
Page 3

7. At the time of the inspection, the silt fence east of the entrance on the north side of the site, and portions of the silt fence along the south side of the site were in disrepair. The geotextile in these areas had collapsed. *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.*

Please send written notification of what corrective measures you have taken as well as a copy of the site's Storm Water Pollution Prevention Plan (SWP3) to this office within 10 days of the date on this letter. Your SWP3 must fulfill the requirements of Part III.G. of the permit.

If there are any questions, please contact me at (419) 373-3025.

Sincerely,



Sarah Clement
Division of Surface Water
Storm Water Program

//lr

pc: c:\DSW-NWDO File
NWDO Follow-up File
Tony Lange, RCS Construction
Rick Bachelor, Safety Service Director, City of Celina