



2GC0231620090605

RICHLAND	ARMED FORCES RESERVE CTR & FIELD MAINTENANCE SHOP	2GC02316 2009/06/05	HABLITZEL, LYNETTE	MANSFIELD
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State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

Re: Richland County
Armed Forces Reserve Center and
Field Maintenance Shop
Construction
Storm Water

June 5, 2009

Mr. Jeff Carr
Jeffrey Carr Construction
4164 Erie Avenue SW
Massillon, Ohio 44648

And

Lt. Col. Gregory Rogers
Ohio Army National Guard
2825 W. Dublin-Granville Road
Columbus, Ohio 43235

Dear Mr. Carr and Lt. Col. Rogers:

On May 19, 2009, Lynette Hablitzel, Walter Ariss, and I inspected the Armed Forces Reserve Center and Field Maintenance Shop at Mansfield Sandusky Road - Airport Road, Mansfield, Ohio. The purpose of our 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 (Construction General Permit), Facility ID No. 2GC02316. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Mr. Larry Huddleston, Project Superintendent for Jeffrey Carr Construction, was present to provide information.

Ohio EPA has no record of other permittees for this site. However, it is our understanding that the Ohio Army National Guard has operational control over construction plans and specifications, including the ability to make modifications to those plans and specifications. This makes the Ohio Army National Guard an "Operator" as defined in Part VII.O. of the permit. Part Part II.A of the Construction General Permit **requires all operators at a construction site to become co-permittees.**

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This letter serves to notify The Ohio Army National Guard of these permitting obligations. Please submit a Co-Permittee NOI to this office or an explanation of why you are not an "operator". Copies of the Co-Permittee NOI may be downloaded from our website at <http://www.epa.state.oh.us/dsw/storm/index.html>.

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

1. At the time of inspection, construction at the site was ongoing. Initial clearing had occurred north of the wetlands. Topsoil had been stripped and stockpiled along the north end of the site. Fill was being brought in and other rough grading was being performed. Most of the storm sewer and sanitary lines were installed. Based on the site maps and observations, over 20 acres appeared disturbed and barren.
2. Silt fence reinforced with wire mesh had been installed around the perimeter of the site. Due to drainage area size and topography, the primary sediment control required for this project was one or more sediment settling ponds, installed within seven (7) days of grubbing and prior to grading. None had been installed. Reviewing the preconstruction contours on the plans, the site primarily drained to the southwest. This would have placed more than 0.5 acre behind the southern line of silt fence. This exceeds the allowable drainage area for silt fence. Looking at the existing site, storm sewers were installed. While the inlets may not have been operational, drainage appeared to be collecting and traveling through the stone bedding and was discharging (concentrated flow) into a large trench cut under the silt fence in the south west end of the construction area (not capable of ponding runoff). *Permit Requires:* Sediment controls shall be functional throughout the course of earth disturbing activity. Structural practices shall be used on all sites remaining disturbed for more than 14 days. All sediment controls must be capable of ponding in order to be considered functional. Sediment basins and perimeter sediment barriers shall be implemented prior to grading and within seven (7) days from the start of grubbing. Appropriate controls must be constructed or existing controls altered to address any changing drainage patterns. *This is a violation of Part III.G.2.d. and d. i. of the permit.*

Permit Requires: Concentrated runoff and runoff from drainage areas which exceed the design capacity of silt fence or inlet protection shall pass through a sediment settling pond. To qualify as a sediment settling pond, structures must meet the following specifications:

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A dewatering zone sized at 67 cubic yards per total contributing drainage acre; dewatering depth less than or equal to five (5) ft. (optimal depths are between 3 to 5 ft.); for ponds serving five (5) acres or more, the dewatering zone shall have a minimum 48 hr. drain time; a sediment storage zone sized at 1000 c.f. per disturbed acre; and the distance between inlets and the outlet at least 2:1 length:width ratio. *This is a violation of Part III.G.2.d.ii. of the permit.*

Permit Requires: The maximum drainage area behind silt fence is:

Drainage Area for 100 Lineal Ft. of Silt Fence	Range of Slope
0.5 acres	<2%
0.25 acres	y% but <20%
0.125 acres	y% but <50%

Where the above criteria is exceeded, a diversion which directs runoff to a sediment settling pond is indicated. *This is a violation of Parts III.G.2.d. iii. of your permit.*

One or more sediment settling ponds must be constructed to lessen the impact of sediment laden runoff. Diversion berms or trenches may be required to convey runoff to the basin(s).

3. There are portions of the site where the use of at least temporary stabilization appeared applicable, such as the stockpiles on the north side of the property. *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. Temporary stabilization is required prior to the onset of winter weather for ground that will be idle over winter. Permanent stabilization is required within 7 days on any portion of the site that has reached final grade or will be idle for longer than 1 year. Soil stabilization practices shall be initiated within two (2) days on inactive, barren areas within 50 feet of a surface water. Permanent seeding and mulching is required before construction activity is completed throughout the entire site. If seasonal or working conditions prohibit the establishment of vegetative cover, other means of stabilization, 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.* As construction continues please keep in mind the permit requirements for stabilization, especially within 50 ft. of surface waters.

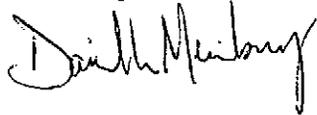
The stockpile is large enough to apply at least temporary stabilization on portions of it, while maintaining a working face if that is necessary.

4. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available. A general overview indicated some deficiencies, such as: drainage areas for structural sediment controls were not delineated on the site map; a construction schedule which described the sequence of major construction operations (grubbing, excavating, grading, utilities and infrastructure installation) and the implementation of erosion, sediment, and storm water management practices or facilities as they relate to each step of the construction sequence, was not evident; and no provisions for a sediment settling pond. This information is a required component of the site's SWP3. *This is a violation of Part III.G. of the permit.*
5. Inspection logs were present and available. The inspection frequency appeared acceptable. However, the storm event durations were not recorded. The inspection reports must also include: inspector's qualifications, 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. Also, according to Part III.G.2.i the inspection records must include any and all corrective actions required, including any changes to the SWP3 that are necessary. That the inspection logs did not note that the required drainage area for silt fence had been exceeded and that a sediment settling pond was required is of concern. The permittee is required to assign qualified inspection personnel to conduct inspections. *These are violations of Part III. G.2.i. of the permit.* It does not appear that the inspection personnel have been adequately trained. Please submit the qualifications of the inspector(s), including any training courses completed and/or professional certifications obtained. For additional details about the minimum content of an inspection report, please see Part III.G.2.i. of the permit. To aid in documenting this information, it is recommended that the qualified inspector use a sketch or a reduced photocopy of the site plan showing the location and type of sediment and erosion control measures. Problems observed at these locations, or at other locations on the construction site, should be highlighted and any corrective measures undertaken should be drawn in and noted in detail.

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Within 10 days of the date on this letter, please submit to this office **written notification** as to 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 current copy of the site's Storm Water Pollution Prevention Plan. If there are any questions, please contact me at (419) 373-3006.

Sincerely,



Danielle Meienburg
Division of Surface Water
Storm Water Program

/llr

pc: DSW-NWDO File
Brian Johnson, Deer Creek Excavating
James De Santo, P.E., Mansfield City Engineer

ec: Major Troy Cramer, Ohio Air National Guard, 179th Airlift Wing,
troy.cramer@ohmans.ang.af.mil
Larry Huddleston, Jeffrey Carr Construction,
larry.huddleston@jcarrconstruction.com