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SANDUSKY GREEN SPRINGS ELEMENTARY  
SCHOOL

2GC02271 2009/09/24 TEBBE, PATRICIA

GREEN SPRING



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road  
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 Korleski, Director

Re: Sandusky County  
Clyde Green Springs Elementary School  
Construction  
Storm Water

September 24, 2009

Mr. Gregg Elchert  
Clyde Green Springs Exempted Villages School  
106 South Main Street  
Clyde, Ohio 43410

ACI Construction Company, Inc.  
2959 U.S. 23  
Alvada, Ohio 44802

Dear Mr. Elchert:

On June 23, 2009, an inspection of the Clyde-Green Springs Elementary School located at 420 N. Broadway Street, Green Spring was done by Danielle Meienburg, Ohio EPA. The purpose of this inspection was to evaluate compliance of the site with your National Pollutant Discharge Elimination System (NPDES) Permit for storm water associated with construction activity, Construction General Permit (CGP) Facility ID NO. 2GC02271\*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. As a result of this inspection, the following are observations or violations of the NPDES permit:

1. Stockpiles were not stabilized. Weathered bare ground around the site was evident. *This is a violation of Part III.G.2.b.i of the CGP.*
2. Silt fence on the north side of the property was not properly entrenched. *This is a violation of Part III.G.2.d.iii and h of the CGP.*
3. Inlet protection was silt fence on a wooden frame instead of the dandy bags called for in the Storm Water Pollution Prevention Plan (SWP3). It was observed in at least one instance that a dewatering hose was inserted through a hole in the silt fence. On another inlet the silt fence was not properly entrenched and sediment was released into the catch basin. *This is a violation of Part III.G.2.d.iii and h of the CGP.*



4. A review of the SWP3 provided to this office as requested in a June 24, 2009, e-mail request to the Buehrer Group shows the following deficiencies:
  - A. Part III.G.1.g of the CGP requires that sediment control devices remain functional until the upslope development area is stabilized. The implementation schedule in the SWP3 states that the temporary sediment controls will be removed before seeding.
  - B. Part III.G.1.h of the CGP requires the name of receiving stream be given.
  - C. Part III.G.1.m of the CGP requires that logs documenting grading and stabilization activities be included.
  - D. Part III.G.1.n.vii of the CGP requires a sediment or storm water management basin with sediment settling volume and contributing drainage area be shown.
  - E. Part III.G.1.n.ix of the CGP requires that the area for cement truck washout be designated.
  - F. Part III.G.2.e of the CGP requires that the SWP3 contain a description of the post construction best management practices (BMPs) that will be installed during construction of the site and the rationale for their selection.
  - G. Part III.G.2.e of the CGP states that permittees must request approval from Ohio EPA to use alternative post-construction BMPs and that post-construction BMPs must be equivalent in effectiveness to those listed in Table 2 of the CGP.
  - H. Part III.G.2 of the CGP states that Ohio EPA recommends that the erosion, sediment, and storm water management practices used to satisfy the conditions of the CGP should meet the standards and specification in the current edition of Ohio's Rainwater and Land Development manual (rainwater manual) or other standards acceptable to Ohio EPA.

The post-construction control installed for the Green Springs elementary school is a concrete containment structure, with an infiltration bottom and a VortSentry hydrodynamic separator. Hydrodynamic separators have not been approved for post-construction controls and can only be accepted on a case by case basis. The literature submitted for this structure only gives controlled laboratory performance data performed with sand sediment particles and not clay particles as will be present at the Green Springs elementary school site.

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As presented in the current edition of Ohio's rainwater manual, the principle threat to infiltration trenches and a common reason for their failure is sediment clogging and sealing off of the permeable soil layer. Infiltration trenches may not be installed until disturbance from construction has ended and soils are stabilized.

Because this post-construction control structure was installed during construction and used for a construction sedimentation control, we cannot consider this structure an adequate practice to be used for the site's post-construction control which is required by the CGP.

Please send written notification of what corrective measures you have taken to this office within 10 days of the date on this letter. If you have any questions, you may contact me at (419) 373-3016 or by e-mail at [patricia.tebbe@epa.state.oh.us](mailto:patricia.tebbe@epa.state.oh.us).

Sincerely,



Patricia A. Tebbe, P.E.  
Division of Surface Water

/llr

pc: [DSW:NWDO:File...]  
Green Springs Engineer  
Buehrer Group  
Sandusky SWCD