



2GC0251420100729

WILLIAMS EDGERTON PREK-8 ADDITION

2GC02514 2010/07/29 CLEMENT, SARAH

EDGERTON

Re: Williams County
Edgerton Pre K-8 Addition
Construction
Storm Water

July 29, 2010

Mr. J. Richard Gieringer
Edgerton Local School District
324 North Michigan Avenue
Edgerton, Ohio 43517

Dear Mr. Gieringer:

On June 28, 2010, Judson Delancey and I inspected Edgerton Pre K-8 School Addition at 111 East River Street in Edgerton, Ohio. 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 GC02514*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Kenny Miller, from Hamilton Hunter Builders, and Jason Strickler, from DCK, were 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. Structural construction of the addition onto the existing school buildings had begun.
2. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available. A general overview of the SWP3 indicated some deficiencies. The SWP3 did not have up to date site drawings that indicate the current placement of sediment and erosion control practices. It also did not indicate the designated concrete washout area on the construction site.

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3. Inspection logs were not kept. Inspections must be conducted weekly and within 24 hours or 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 day, 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. Silt fence had been placed under the grate of the catch basin at the southeast side of the site. Ohio EPA does not accept this practice as proper inlet protection. *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.* I recommend that proper inlet protect, such as a prefabricated inlet protection, be installed.
5. A construction entrance is needed on the south side of the site, off of East River Street, where vehicles are accessing the site.
6. The concrete washout area was located on the south side of the site; however it appears that concrete washout had occurred on the north side of the site as well. No controls were installed on the north side of the site to ensure the concrete wash water would not flow into a sewer system or leave the site. *Permit Requires:* The Storm Water Pollution Prevention Plan (SWP3) must provide BMPs for pollutant sources other than sediment. Non-sediment pollutant sources, which may be present on a construction site, include paving operations, concrete washout, structure painting, structure cleaning, demolition debris disposal, drilling and blasting operations, material storage, slag, solid waste, hazardous waste, contaminated soils, sanitary and septic wastes, vehicle fueling and maintenance activities, and landscaping operations. *This is a violation of Part III.G.2.g of the permit.*

Please send written notification of what corrective measures you have taken within 10 days of the date on this letter. Your response should include dates, either actual or proposed, for the completion of the actions.

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

Sincerely,



Sarah Clement
Division of Surface Water
Storm Water Program

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pc: ↵DSW-NWDO-File↵
NWDO Follow-up File
Dennis M. Bell, Williams County Engineer
Williams County SWCD
Jason Strickler, DCK North America, LLC
Kenny Miller, Hamilton Hunter Builders