



\*2GC0210920100730\*

WOOD BOWLING GREEN WTP 2GC02109 2010/07/30 DELANCEY, JUDSON BOWLING GREE



**Environmental  
Protection Agency**

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

Re: Wood County  
Bowling Green WTP  
Construction  
Storm Water

July 30, 2010

Mr. Kevin Maynard  
City of Bowling Green  
304 N Church St  
PO Box 388  
Bowling Green, OH 43402

Mr. Chuck Kethel  
ES Wagner Co  
840 Patchen Rd  
Oregon, OH 43616

Dear Mr. Maynard & Mr. Kethel:

On July 12, 2010, Sarah Clement and I inspected the Bowling Green WTP construction site at 17549 W River Rd, Middleton Twp in Wood County. 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. 2GC02109\*AG. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Brent, a Plant Operator, was present to provide information on the project. Ohio EPA has record that you are both Co-Permitted.

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

1. At the time of inspection, construction appeared to be ongoing. Buildings had been erected and the roofs were being put on. Approximately 3 acres of land were disturbed and barren.
2. Due to the absence of personnel or a construction trailer, the Storm Water Pollution Prevention Plan (SWP3) and inspection logs were not available for review. Without this information, it is difficult to make detailed recommendations regarding the placement and type of any needed structural controls.
3. Storm drain inlet protection had not been installed on the two inlets in the northeast corner. *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 your permit.* I recommend that proper inlet protection be installed.

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Pre-fabricated inlet protection products are available for yard inlets. They may decrease labor costs, tend to have less installation error, and can be re-usable. Please check with our office on the acceptability of individual products.

4. All temporary or permanent stabilization has not been established; especially the stock piles in the north and southeast portions of the site. The presence of rills and weed growth indicate the timeframe for stabilization may have been exceeded.

*Permit Requires:* Portions of the construction site that 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 days on inactive, barren areas within 50 feet of a stream. In addition, disturbed areas in residential subdivisions must be stabilized at least 7 days prior to transfer of permit coverage for individual lot(s). 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. *Failure to do so is a violation of Part III.G.2.b.i of your permit.*

The *Rainwater and Land Development Manual* states that, "mulch material shall be applied immediately after seeding," and, "permanent seeding shall include irrigation to establish vegetation during dry or hot weather or on adverse site conditions as needed." Optimum seeding dates for Northwest Ohio are generally from April to May, or from mid-August until the end of September, depending on the type of vegetation planted. *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.b.i of the permit.*

Where vegetative stabilization techniques may cause structural instability or are otherwise unobtainable, due to seasonal conditions, alternative stabilization techniques must be employed and maintained. It is important to note that some type of cover is needed to minimize sediment loss until a sufficient cover of vegetation has been established to prevent erosion. I recommend that all inactive, unstable areas be mulched until the fall/spring, when conditions are more favorable for permanent seeding.

I do not recommend the use of feed/livestock bedding material as mulch, as it may not have been suitably prepared for this type of use (weeds/bacteria). Also, some of the contents, such as corncobs, may cause nitrogen deficiency unless adequately compensated for.

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5. I observed that the silt fence for the entire site is lacking maintenance. *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 your permit.* For more information on the correct installation and maintenance techniques, please see the *Rainwater and Land Development Manual*. *Permit Requires:* Control practices must be repaired within three days of inspection. *This is a violation of Part III.G.2.i.i of the permit.*

Within seven 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.

If there are any questions, please contact me at (419) 373-3036.

Sincerely,



Judson M. Delancey IV  
Division of Surface Water  
Storm Water Program

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Pc: **NWDO file**  
Follow up file  
Wood County SWCD  
Raymond A. Huber, P.E. P.S.  
Jim Bostdorff, Middleton Twp. Trustee Chairman  
Brian O'Connell P.E., City of Bowling Green  
Paul Brock P.E., City of Bowling Green