

**Environmental
Protection Agency**

Director
Lt. Governor
Governor
Director

October 27, 2011

RE: WAYNE COUNTY
CITY OF ORRVILLE
JM SMUCKER PROJECT HERITAGE PH 2
CONSTRUCTION STORM WATER

Carlos Bastos, P.E.
The Dennis Group LLC
1537 Main Street
Springfield, MA 01103

Dear Mr. Bastos:

On October 6, 2011, Ohio EPA received revisions to the Storm Water Pollution Prevention Plan (SWP3) for the above referenced project. These revisions were made in response to our letter dated September 22, 2011. Our records show that on September 22, 2011, the JM Smucker Co was granted coverage under the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activities #3GC05655*AG to discharge storm water from this construction project.

Upon my review of the plan revisions and newly-submitted plan sheets, the following concerns remain:

- **Section 2.4 Stabilize Soils.** The text still does not correctly state the requirements contained in the NPDES permit for initiation of temporary stabilization. The NPDES permit requires temporary stabilization to be initiated within seven (7) days whenever an area is disturbed but will remain idle for 21 days or longer. Temporary stabilization must be initiated within two (2) days if the disturbance occurs within 50-feet of a water of the state.
- **Plan Sheet C2.01.** The plan sheet uses the term "biofiltration swale" for the bioretention cell along the north side of the parking lot, yet the narrative in the SWP3 and long-term maintenance plan use the term "bioretention cell". For clarity, the terminology used should be consistent across all plan sheets and SWP3 documents. Please modify to use only a singular term for this practice.
- **Plan Sheet C2.03.** In order to satisfy both of the construction and post-construction requirements of the NPDES permit, the outlet structures of Detention Basin #1 and Detention Basin #2 must be modified when the basins are converted from sediment basins to dry extended detention basins. Certain openings will need to be sealed or cut at appropriate times during the construction sequence. Similarly, Detention Basin #3 will

be converted from three (3) sediment traps into a multi-celled dry extended detention basin. Thus, the outlet structure for Detention Basin #3 pictured on Sheet C2.03 should not be installed until the sediment traps are no longer needed. For clarity, please ensure that the construction sequence reflects the proper timing of outlet conversion and the actions that must be taken for each basin. We recommend that the sequence be as specific as possible with references to the appropriate plan sheet and detail drawing.

- **Plan Sheet C3.02.** There appears to be some confusion in the construction sequence. Conversion of sediment basins into dry extended detention basins should occur only after construction is essentially complete and areas disturbed by construction have been stabilized. Until such time, the sediment basins and their associated outlet structures, i.e., skimmers, should remain in place. Please revise the construction sequence to reflect this order of BMP installation and maintenance.
- **Plan Sheet C4.02.** Drawing 5 shows the section for Sediment Basin #1 and Drawing 6 shows the section for Sediment Basin #2, but does not specify the various elevations needed to ensure the basins are constructed with sediment storage areas with the required volumes. Please add elevations to the section drawings. Further, it appears that you are relying on the forebay and micropool of the dry extended detention basin to provide you with the required sediment storage volume for your sediment basins. Please specify that sediment accumulated within these areas during construction must be removed once construction is completed to restore their required post-construction storage volumes. This should also be reflected in the construction sequence.
- **Engineering Report.** Although the report contains a calculation of a Water Quality Volume (WQv) for post-construction drainage area #3, no post-construction water quality BMP has been provided for this area. Please be aware that the NPDES permit requires post-construction BMPs to be provided for all developed areas. The only situation where this may not be required is in a redevelopment scenario. In such a scenario, since only 20% of the WQv must be treated, it is possible to provide all the treatment within only one portion of a project and no treatment in another. However, there is no indication in the SWP3 that this project is a redevelopment scenario. As such, please identify the post-construction BMP that will be implemented for Drainage Area #3. If a suitable on-site solution is not feasible, the NPDES permit does allow for off-site mitigation with prior approval of Ohio EPA. Off-site mitigation may include installation of a storm water retrofit elsewhere within the JM Smucker campus where there is no post-construction BMP currently, e.g., an older parking lot. The WQv that must be treated in an off-site mitigation scenario is 1.5 times the WQv not being treated on-project or the WQv at the point of retrofit, whichever is greater. If you wish to pursue an off-site mitigation solution, please submit your off-site BMP mitigation plan to me for approval.

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Please review these comments on the revised SWP3 and provide me with a letter of response indicating how you will address them. Please submit your response by November 10, 2011.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

cc: Bob Metze, JM Smucker Co
Lynn Snyder, Engineer, City of Orrville
David Handwerk, Mayor, City of Orrville
Steve Wheeler, Public Service and Safety Director, City of Orrville

ec: Dan Osterfeld, Ohio EPA, DSW, CO
Megan Oberst, Army Corps of Engineers, Huntington District