



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 18, 2011

RE: WAYNE COUNTY
CITY OF ORRVILLE
JM SMUCKER – DISCOVERY BUILDING
CONSTRUCTION STORM WATER

Aaron Thompson
Domokur Architects
4651 Medina Rd.
Akron, OH 44321-1315

Rob Misutka
The JM Smucker Co
1 Strawberry Lane
Orrville, OH 44667

Dear Mr. Thompson and Mr. Misutka:

On November 9, 2011, I performed a compliance inspection for storm water best management practices (BMPs) at the above referenced site. I was accompanied on my inspection by Todd Surrena, also of the Ohio EPA Division of Surface Water. After my inspection, I spoke with Darren Alber of Alber Construction to discuss my findings. Our records indicate that Domokur Architects and the JM Smucker Company have obtained coverage under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC04893*AG to discharge runoff from this project.

My inspection revealed that construction is complete and vegetative growth density has reached 70% or greater. As such, it is now appropriate to remove all temporary sediment controls and install post-construction BMPs. However, in reviewing the drawings in our files and responses to past correspondences, it is still not clear what post-construction BMPs are being provided to meet National Pollutant Discharge Elimination System (NPDES) permit requirements for this project. In particular, Sheet C210 revised June 12, 2009, indicates that three post-construction water quality practices are being provided: Extended Detention Basin #1, Extended Detention Basin #2 and a Bioretention Basin. However, Sheet C204 and Sheet C208 revised September 1, 2010, indicate that only one dry extended detention basin is being provided for the project. I will assume that the intent is to provide the practices depicted in the plan set amended September 1, 2010.

Per Detail 4 on Sheet C208, Outlet Structure OS3 will be the only one being modified to provide extended detention of the water quality volume (WQv). This raises several questions that must be answered to ensure compliance with Ohio EPA requirements:

- The SWP3 indicates that this project is a redevelopment of previously developed land. As a redevelopment project, the NPDES permit requires that 20% of the WQv be treated. Sheet C204 indicates that 20% of the WQv for this project is 965 cubic feet. Why is extended detention of 965 cubic feet being provided at OS3 rather than OS1? OS3 discharges to the detention basin where OS1 is installed. OS1 is an outfall from the developed site. It would be more appropriate to treat runoff at OS1.
- If OS3 is modified as indicated in detail drawing 4 on Sheet C208, will it provide extended detention for a volume of at least 965 cubic feet?
- What is the size of the drainage area to OS3, in acres, and the percent imperviousness of its drainage area?
- At what elevation within the OS3 detention basin is storage of 965 cubic feet achieved?

Please provide me with clarification on these questions so that I can verify compliance with NPDES requirements. It would be prudent to wait for verification from Ohio EPA that the design of post-construction BMPs will meet Ohio EPA requirements before any changes are made to the structures on site. If any amendments are needed to the SWP3 to meet post-construction requirements, please provide me with a copy of the amended plans.

Please provide me with a letter of response no later than December 5, 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, The JM Smucker Co.
Lynn Snyder, Engineer, Village of Orville
David Handwerk, Mayor, City of Orrville
Steve Wheeler, Public Service and Safety Director, City of Orrville