



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

Re: Crawford County
Scioto Prairie
Construction
Storm Water

May 1, 2012

Mr. Patrick Hord
Hord Family Farms Inc.
2742 Shearer Road
Bucyrus, Ohio 44820

Mr. Leonard Martin
Farmerboy Ag Inc.
50 West Stoever
Myerstown, Pennsylvania 17067

Dear Messrs. Hord and Martin:

On April 3, 2012, Michelle Sharp and I inspected Scioto Prairie at 998 and 1002 Scioto Chapel Road, Bucyrus Township (photos taken). The purpose of the visit was to evaluate compliance of the site with the National Pollutant Discharge Elimination System (NPDES) permit for storm water discharges associated with construction activity, Facility ID No. 2GC03035. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. No one was present onsite at the time of the visit.

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

1. At the time of the inspection, there was no earthwork occurring and no earthmoving equipment appeared to be present. The exterior of the barns appeared to be complete. A stone entrance and access roads were present along the south side of the buildings, with little evidence of sediment tracking onto Scioto Chapel Road. What seemed to be a feed storage bunker was present north of the stone entrance.
2. Sediment controls were not in place to address all runoff from the site. Runoff from the east of the buildings and access road was addressed by a line of silt fence. Runoff south of those buildings sited west of the entrance drained to the south and to a line of silt fence. Runoff from north of the barns appeared to drain to the north, where another line of silt fence had been installed. The silt fence was missing near the center of this line.

Runoff between the barns sited east of the entrance drive and north of the stone access road appeared to drain to three separate culverts. Two of the culverts were fitted with a perforate riser pipe wrapped in a geotextile. Since the Storm Water Pollution Prevention Plan (SWP3) was not available to review, I cannot verify that these two detention areas are configured to meet the permit requirements of a sediment settling basin. Please note that the drainage patterns of the site require the implementation of one or more sediment

settling ponds. To qualify as a sediment settling pond, structures must meet the following specifications: a dewatering zone sized at 67 cubic yards per total contributing drainage acre; dewatering depth less than or equal to five feet (optimal depths are between three to five feet); for ponds serving five acres or more, the dewatering zone shall have a minimum 48 hours drain time; a sediment storage zone sized at 1000 c.f. per disturbed acre; and a minimum 2:1 length to width ratio between all inlets and the outlet.

The riser for the third and western-most culvert was detached. Runoff from this area did not appear to pass through another sediment control. A significant amount of sedimentation was noted behind the rock check dam located down-gradient. Beyond that, sediment was covering the rock apron placed east of the culverts under the facility's entrance.

Permit Requires: Structural controls shall be used on all sites remaining disturbed for more than 14 days. Sheet flow from denuded areas shall be intercepted by sediment barriers. Flows that exceed the design capacity of sediment barriers shall pass through a sediment settling pond. *This is a violation of Parts III.G.2.d. ii. and iii. of the permit.* Please install sediment controls to address all runoff from the project.

3. A couple of the sediment and erosion controls did not seem to be properly installed. A soil stockpile/berm was present south of the barns and access road. A line of silt fence had been placed along the south side of the berm, but had not been curved upslope at the western end to capture runoff. The last rock check dam (located on the west side of the stockpile/berm) did not appear to be saddle-shaped and had a gully eroding around its east end.

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.* In order to pond water and be effective, silt fence must be installed parallel to the contour of the land and curved upslope at each end of the line. To prevent erosion around the ends, the rock check dams must be properly shaped to channel flow over the center of the dam.

4. All temporary or permanent stabilization has not been established. Long term erosion was evident by the large rills and gullies present throughout the site.

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 seven days on any portion of the site that has reached final grade or will be idle for longer than one year. 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. *This is a violation of Part III.G.2.b.i. of the permit.* As a minimum, I recommend permanent seeding followed by a cover of mulch (two tons/acre). It is important to note that some type of immediate cover must accompany any seeding

Messrs. Hord and Martin
May 1, 2012
Page Three

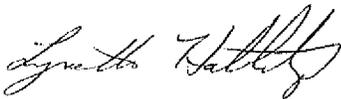
method to minimize sediment loss until a sufficient cover of vegetation has been established to prevent erosion. For drainageways, erosion control matting may be required in place of straw mulch.

5. Evidence of a burn pile was observed north of the barns. Please note there are restrictions on the type of materials and locations used for open burning (see <http://epa.ohio.gov/dapc/general/openburning.aspx>). As part of your SWP3, onsite personnel must be advised about open burning restrictions.
6. No structural post construction storm water management controls were evident. The Notice of Intent (NOI) application form indicated that Scioto Prairie is large construction activity under the terms of the permit. As such, permanent structural post-construction Best Management Practices (BMPs) must be installed to treat the water quality volume (WQv) and ensure compliance with Ohio's Water Quality Standards in Ohio Administrative Code 3745-1. An additional volume equal to 20% of the WQv shall be incorporated into the BMP for sediment storage and/or reduced infiltration capacity. BMP types and drain times shall meet those in Table 2 of the permit. *Please see Part III.G.2.e. of the permit.*

Within 10 days of the date on this letter, please submit to this office **written notification** as to 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. In your letter, you must describe how the post construction storm water management requirement will be met. Your reply shall include the type(s) of practices you are implementing, the basis for their design, and installation dates.

If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Program

/jlm

ec: Mike Hall, Program Administrator, Crawford County SWCD
Cecil Newcome, PE, PS, Crawford County Engineer

pc: NWDO File