



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Re: Lucas County  
Jerome Road, Monclova Road & Russell Road  
Construction  
Storm Water

July 3, 2012

Mr. Joel S. Palermo  
Lucas County Engineers Office  
One Government Center Suite 870  
Toledo, Ohio 43604

Mr. David Bowers  
Bowers Asphalt & Paving Inc.  
6157 Walbridge Road  
Walbridge, Ohio 43465

Mr. Joseph R. Camp  
City of Maumee  
400 Conant Street  
Maumee, Ohio 43537

Dear Messrs. Palermo, Bowers, and Camp:

On May 15, 2012, Lynette Hablitzel, Jessica Heitman, and I inspected Jerome Road, Monclova Road and Russell Road. 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 2GC02870. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111.

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

1. At the time of inspection, construction at the site was nearly complete. Both the road and a bike path were installed. Painting crews were marking the intersection of Jerome and Russell Roads.
2. On May 17, 2012, I received a copy of the SWP3 by e-mail from Doug Parish, Project/Design Engineer for Lucas County Engineers. The primary sediment controls for the southern portion of Jerome and Russell Roads are several sediment traps. Sufficient detail was not provided to determine if the sediment traps meet all the design criteria of the permit. Specifically, the drainage area of each trap was not provided and was not delineated and labeled on the site map. The detail drawing did not show the area/dimensions of each trap. It was also unclear what post construction storm water management practices will be implemented for the project. According to the Notice of Intent (NOI) application, this project is a 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. Drain times shall meet those in Table 2 of the permit. This information is a required component of the site's SWP3. *This is a violation of Part III.G. of the permit.*

3. The southeast portion of Sediment Trap 1 had a stone outlet structure that was level across the top. The outlet must be "U" shaped so that water will be directed over the centerline of the structure.

*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.*

4. According to the SWP3, the primary sediment control for the north side of the project area is inlet protection. Storm drain inlet protection had been installed and appeared to be a product called Vertipro. Vertipro consists of a geotextile connected to a metal frame. The geotextile was somewhat sheer. Standing on one side of the structure, I could look through two panels and see the ground on the opposite side of the catch basin. This fabric did not appear to meet permit objectives. From the drawings, these inlets did not appear tributary to a sediment settling pond. Proper inlet protection must be installed in any areas where soil remains unstabilized.

*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.*

5. On the north side of Sediment Trap 1, the culvert that discharges into the trap did not have a stabilized discharge point. Erosion had begun to cut into the centerline of the channel.

*Permit Requires:* Operators shall undertake special measures to stabilize channels and outfalls. The SWP3 shall incorporate measures that control flow so as to prevent erosion. *This is a violation of Part III.G.2.b.ii. (stable conveyance channel) of the permit.* I recommend adding a stone apron below the inlet or seeding with an erosion control blanket to stabilize the area.

6. Most of the site had been seeded and a fair cover of grass established. There were a few exceptions to this:

- On the east side of Russell Road, north of where Russell Road curves, the east bank of Sediment Trap 1 was not stabilized and had rills forming. Please keep in mind that stabilization must be applied within two days on any areas within 50 feet of a surface water. *See Part III.G.2.b.i. of the permit.* This area may require erosion matting to successfully establish vegetation.
- Northeast of the intersection of Russell Road and Jerome Road and southeast of Monclova and Jerome Roads, there was bare soil that had yet to be stabilized. Stabilization must be applied within seven days of reaching final grade in accordance with *Part III.G.2.b.i.*

Messrs. Palermo, Bowers and Camp  
July 3, 2012  
Page Three

Within 10 days of the date on this letter, please submit to this office a **written response** to the above comments. Your reply should describe the actions taken or proposed to prevent any future violations, including dates for the completion of the actions. Please describe how the post construction storm water management requirements will be met for this project. Your reply should include the type(s) of practices you are implementing and the basis for their design.

If there are any questions, please contact me at 419-373-3011.

Sincerely,



Bernard E. Weik  
Division of Surface Water  
Storm Water Program

/jlm

ec: Jeff Grabarkiewicz, Lucas County SWCD  
Tracking