



**Environmental
Protection Agency**

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

Re: Lucas County
Bayshore Medical Office Building
Construction
Storm Water

July 3, 2012

Mr. Peter Westmeyer
Manager
WP II LLC
181 West Madison, Suite 4700
Chicago, Illinois 60602

Dear Mr. Westmeyer:

On June 4, 2012, Lynette Hablitzel, Jessica Heitman, and I inspected the Bayshore Medical Office Building at 3333 Dustin Drive, Oregon. The purpose of our 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. 2GC03137. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Our records indicate that there are no co-permittees on this project. Mr. Mathew Robson, Assistant Superintendent of Premier Design and Build Group, was present to provide information on the project. As a result of the inspection, I have the following comments:

1. At the time of inspection, construction was underway. Catch basins had been installed but were slightly above grade. In the southwest corner of the site, an extended detention pond had been roughed in and workers were installing one of the storm sewer inlets.
2. The Storm Water Pollution Prevention Plan and inspection logs were available on site. Since the SWP3 was not reviewed in depth, we cannot verify whether the storm pond was of sufficient depth, volume, and configuration to fulfill the requirement of a sediment settling basin. Since the project broke ground on May 23, 2012, the only completed inspection log was dated May 29, 2012. The logs need to include more detail, such as specific observations of discharges (i.e. discharging/not discharging, clear/turbid, etc.).

As the project continues, please be sure to conduct inspections weekly and within 24 hours of a 0.5" rainfall. Inspections must include: disturbed areas, material storage areas, all sediment and erosion control measures, discharge locations, and all vehicle access points. Records must include: inspector name and qualifications, inspection date, observations, a certification that the facility is in compliance with the SWP3 and the permit, and identify any incidents of non-compliance. The record and certification

must be signed in accordance with Part V.G. of the permit. Please see Part III. G.2.i. of the permit. The permit also requires that a log documenting grading and stabilization activities, as well as amendments to the SWP3, be maintained (see Part III.G.1.m. of the permit). To stay in compliance with the stabilization requirements, I recommend that a site map be used to more accurately delineate work areas and note the related dates.

3. A paved parking lot existed to the north of the site. The SWP3 had a stone construction entrance on the south side of the site. No sediment tracking was observed.
4. Silt fencing was installed around the perimeter of the site. However, the joints were incorrectly installed. The lines of silt fencing overlapped at the ends. Instead, the stakes must be twisted around each other so that the fabric wraps around both stakes before staking the fence into the ground. Also, there were tears in the fabric at several locations. At the time of our visit, the grade of most of the site was below the perimeter silt fence. The installation of the silt fence must be corrected prior to any grade changes that will direct runoff towards the silt fence.

Permit requires: All sediment and erosion control practices must meet the standards of the current edition of *Rainwater and Land Development: Ohio's Standards for Storm Water Management, Land Development, and Urban Stream Protection*. Please see Part III.G.2. of the permit.

According to the SWP3, all catch basins drain to an extended detention pond in the southwest corner of the site. Mr. Robson stated that the pond's outlet had not yet been connected to the offsite storm sewer. The profile drawings showed a 0.83" orifice at elevation 599.5 feet and a 6" orifice at 600.6 feet. The 0.83" orifice had not yet been drilled. The pond is required to meet the design requirements for a sediment settling pond until construction activities have ended and a perennial vegetative cover of 70% density has been achieved over the tributary area. The SWP3 did not contain calculations for a sediment settling pond, and profile drawings did not indicate a temporary modification to the pond's outlet structure in order for the pond to serve as a sediment settling pond. At the time of our visit, the storm sewer pipes into the pond were being installed a significant distance beyond the banks and towards the center of the pond. I am concerned that this design will create short circuiting and diminish the water quality function of the pond both during and after construction.

Permit Requires: 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 5 feet (optimal depths are between 3 to 5 feet); for ponds serving five acres or more, the dewatering zone shall have a minimum 48 hour drain time; a sediment storage zone sized at 1000 c.f. per

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disturbed acre; and the distance between inlets and the outlet at least 2:1 length:width ratio. *Please see Part III.G.2.d.ii. of the permit.* It will be necessary to modify the pond if it does not already meet all of these requirements.

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 completion of the actions. Please demonstrate how the sediment settling pond design requirement will be met for this project. Information must include the pond's maximum drainage area, riser pipe/spillway elevations, the required dewatering volume and the required sediment storage volume, and the related elevations at which these volumes are obtained.

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: Andrea Beard, Department of Public Service, City of Oregon
Tracking