



**Environmental
Protection Agency**

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

Re: Lucas County
VA Outpatient Clinic
Construction
Storm Water

August 9, 2012

Mr. Adrian Anderson
Toledo VA Company LLC
27500 Detroit Road Suite 300
Westlake, Ohio 44145

Mr. Michael Bettinger
Douglas Company
1716 Perrysburg-Holland Road
Holland, Ohio 43523

Mr. Ronald Swan Jr.
TSP Environmental
12641 Stark Road
Livonia, Michigan 48150

Dear Messrs. Anderson, Bettinger, and Swan:

On July 24, 2012, I inspected VA Outpatient Clinic at 1200 South Detroit Avenue, Toledo (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. 2GC02842. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111.

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

1. At the time of inspection, the parking lot and building had been constructed.
2. A retention pond was installed north of the building. Without reviewing the Storm Water Pollution Protection Plan (SWP3), I am unable to determine if the pond meets the requirements of the permit. *Permit Requires:* Concentrated runoff and runoff from drainage areas that exceed the design capacity of silt fence or inlet protection shall pass through a sediment settling pond. 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 hr. drain time; a sediment storage zone sized at 1,000 c.f. per 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. In your reply to this letter, please verify if you are using the pond as a sediment settling pond and if it meets the permit's design requirements.

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3. To the south of the building's main entrance, inlet protection had been installed in the form of a geotextile covering the inlet. Not only is this not an effective form of inlet protection, but the geotextile covering the inlet had numerous holes in it. Also, the inlets in the parking lot and drive ways lacked inlet protection. Unless the catch basins lead into a sediment settling pond (see pond requirements listed above), proper inlet protection must be installed. *Please see Part III.G.2.d.iv of the permit.*
4. All temporary or permanent stabilization has not been established. The site has been seeded and was being watered at the time of inspection, but has not yet reached a 70% density of perennial vegetation. Please be aware that a Notice of Termination (NOT) form may not be submitted to end permit coverage until a 70% density of perennial vegetative cover has been reached.

Within 10 days of the date on this letter, please submit to this office **written notification** as to the reasons for the above mentioned comments as well as the actions taken or proposed to prevent any future violations. Your response should include the dates, either actual or proposed, for the completion of any 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

cc: Patekka Pope Bannister, City of Toledo Division of Environmental Services
Tracking