



**Environmental
Protection Agency**

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

September 4, 2012

RE: LORAIN COUNTY
CITY OF LORAIN
CONSTRUCTION STORM WATER
LORAIN CITY SCHOOLS

Dan Denicola
Chief Operations Officer
Lorain City Schools
2350 Pole Ave.
Lorain, OH 44052

Dana Strizzi
Hammond Construction
1278 Park Ave SW
Canton, OH 44706

Dear Mr. Denicola and Mr. Strizzi:

Ohio EPA has reviewed the proposal submitted by Bramhall Engineering on July 31, 2012, to address the violations of post-construction storm water management at 13 new or redeveloped school sites within the Lorain City School District. Storm water runoff from these projects is required to comply with the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activities (either# OHC000002 or #OHC000003, depending on when the school site received NPDES permit coverage).

As established in previous submittals by Bramhall Engineering, a total of 26,334 cubic feet of Water Quality Volume (WQv) was required to be treated on the Lorain City School projects, but was not. Thus, the proposed retrofits must treat a total of this WQv. The retrofits contained in the July 31, 2012, proposal do not total to 26,334 cubic feet. Information submitted by Bramhall indicates that they total to:

<u>School Site</u>	<u>WQv provided (ft³)</u>
Washington/Gen Johnnie Walker	8,600
Frank Jacinto Elementary	5,489
Toni Morrison	5,525
Palm Elementary (New Masson)	<u>809</u>
TOTAL	20,423

DEFICIT = 20,423 provided – 26,334 required = -5,911 cubic feet

Thus, there is still a deficit of WQv treatment that has not been addressed by the proposal. Lorain City Schools can move forward with the proposed projects (assuming the site-specific comments which follow are addressed) as they will move the school district toward compliance, but you will still need to address the remaining deficit in some manner as previously described in my past correspondence. Please review your options and provide me with an additional proposal that addresses the remaining deficit.

In addition, I provide the following site-specific comments on the retrofit plans submitted on July 31, 2012:

Washington/Gen Johnnie Walker

- No additional comments.

Frank Jacinto Elementary

- There is no indication that the concrete low-flow channel is being removed from the forebay; however, Ohio EPA believes that will be necessary to construct the dam that creates the forebay. Please clarify your intent and amend the drawings as necessary to properly construct the proposed retrofit.
- The detail drawings on Sheet C3-1A for the basin outlet structure do not indicate any modification to provide a 48-hour drain time of the WQv. However, the summary calculations on Sheet C3-2 indicate a 1-inch WQv orifice will be provided. Please correct the detail drawings on Sheet C3-1A or calculations on Sheet 3-2 as needed to address this discrepancy.
- The detail drawing on Sheet C3-1A does not indicate the elevation at which the WQv is stored. Please indicate the elevation at which 5,489 cubic feet is stored within the basin.

Toni Morrison Elementary

- Sheets C3-1B and C3-1C refer to this project as "Toni Morrison Elementary School", while Sheet MC-4 is titled "New Masson Elementary School". The detention basin pictured on MC-4 and C3-1B appear to be the same. Please clarify if New Masson Elementary is the same as Toni Morrison Elementary.
- There is no indication that the concrete low-flow channel is being removed from the forebay; however, Ohio EPA believes that will be necessary to construct the dam that creates the forebay. Please clarify your intent and amend the drawings as necessary to properly construct the proposed retrofit.
- The detail drawing on Sheet C3-1C indicates that a 1-inch WQv orifice will be provide for this basin, yet there is no calculation on Sheet C3-2 to demonstrate that this is the correct size needed to provide a 48-hour drain time of the WQv. Please provide the calculations necessary to determine compliance with the NPDES permit and amend Sheet C3-1C as needed to meet NPDES requirements.
- The calculations on Sheet C3-2 indicate that the WQv associated with the Toni Morrison school is 5,525 cubic feet. It appears that this WQv will be mitigated by retrofitting an

existing detention basin for water quality treatment. Please indicate the elevation at which 5,525 cubic feet is stored within the basin.

Palm Elementary

- There is no detail drawing associated with this school site to indicate how 809 cubic feet of WQv will be treated at Palm Elementary. Please clarify the intent of your proposal. If you will not be treating 809 cubic feet of WQv on the Palm Elementary site, then this number must be added back to the deficit and addressed accordingly.

Please review my comments and provide me with a revised retrofit plan **no later than October 1, 2012**. Failure to submit a retrofit plan that addresses the requirements of the NPDES permit by this date will result in this matter being referred to our Central Office for formal enforcement action. Failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07 and is punishable by fines of up to \$10,000 per day of violation.

If you would like to meet to discuss amendments or additional retrofit plans before submitting them, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

cc: Thomas Tucker, Superintendent, Lorain City Schools
Dale Vandersommen, Engineer, City of Lorain
Bob Papotto, Bramhall Engineering

ec: Mark Mann, Manager, Storm Water and Enforcement Section, DSW, CO