



**Environmental Protection Agency**

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

September 26, 2012

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

Jeff Hawkes  
Lorain City Schools  
2350 Pole Ave.  
Lorain, OH 44052

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

Dear Mr. Hawkes and Mr. Strizzi:

Ohio EPA has reviewed the submittal from Bramhall Engineering dated September 25, 2012, to address the violations of post-construction storm water management at 13 new or redeveloped school sites within the Lorain City School District. This submittal was made in response to my letter dated September 4, 2012.

After review of the submitted information, Ohio EPA finds that your plan meets the minimum requirements of the Ohio EPA General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activities. Implementation of this plan will return Lorain City Schools to compliance with the following NPDES permits:

**Lorain City School Projects**

Name of School	Name of School on NOI or Former Name	General NPDES Permit #	Facility Permit #	Large or Small Construction Activity*	New or Redevelopment
Washington Elementary	Washington Elementary	OHC000002	3GC00314*AG	Large	Redevelopment
Larkmoor Elementary	Larkmoor Elementary	OHC000002	3GC00315*AG	Large	Redevelopment
Frank Jacinto Elementary	Charleston Elementary	OHC000002	3GC00316*AG	Small	Redevelopment
Longfellow Middle	Longfellow Middle	OHC000002	3GC00818*AG	Large	Redevelopment
Gen Johnnie Wilson Middle	Washington Middle	OHC000002	3GC00837*AG	Large	New Development
Garfield Elementary	Garfield Elementary	OHC000002	3GC01179*AG	Small	Redevelopment
Palm Elementary	Palm Elementary	OHC000002	3GC01181*AG	Small	Redevelopment
Hawthorne Elementary	Hawthorne Elementary	OHC000003	3GC04299*AG	Small	Redevelopment
Steven Dohanos Elementary	Lincoln Elementary	OHC000003	3GC04300*AG	Large	Redevelopment

Southview Middle	Whittier Middle	OHC000003	3GC04783*AG	Large	New Development
Adm. Ernest J. King Elementary	Irving Elementary	OHC000003	3GC04784*AG	Large	Redevelopment
Helen Steiner Rice Elementary	Homewood Elementary	Started 5/2005 NO PERMIT	3GC05756*AG as of 12/19/11	Large	Redevelopment
Toni Morrison Elementary	Masson Elementary	Started 5/2005 NO PERMIT	3GC05755*AG as of 12/19/11	Small	Redevelopment

\* Determination based on reported disturbance on Notice of Intent (NOI)

The plan for compliance will involve retrofitting the detention basins at Washington Elementary, Frank Jacinto Elementary, and Toni Morrison Elementary Schools to provide dry extended detention basins with forebays and micropools. These projects, along with the previously approved retrofit of the detention basin at Southview Middle School, will provide treatment of the cumulative required Water Quality Volume (WQv) for the 13 school projects.

**Please provide Ohio EPA with an expected completion date for each retrofit project as well as a notification once the retrofit of each site has been completed.**

Finally, please be aware that the future Lorain High School will also be subject to the post-construction storm water requirements of the Ohio EPA NPDES Permit for Storm Water Associated with Construction Activity. Ensure that the construction plans include the practices required to meet NPDES requirements before they are sent out to bid or approved for construction. Failure to proactively address these requirements at the Lorain High School site will result in a referral to our Central Office for escalated enforcement. Failure to comply with the requirements of 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 have any questions, 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  
 Bob Papotto, Bramhall Engineering  
 Dale Vandersommen, Engineer, City of Lorain  
 Chase Rittenaur, Mayor, City of Lorain

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