



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

Re: **Notice of Violation**
Erie County
Perkins Township Administrative Complex
Construction Storm Water
Facility ID No. 2 GC03274

May 7, 2013

Mr. Eric Dodrill
Perkins Township
2610 Columbus Avenue
Sandusky, Ohio 44870

Dear Mr. Dodrill:

On April 3, 2013, I inspected Perkins Township Administrative Complex at 2610 Columbus Avenue, Perkins Township (photos taken). The purpose of my 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 (Construction General Permit or CGP). The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. You were present to provide information on the project. I was also present at the site on April 24, 2013. Ohio EPA has no record of other permittees for this project.

As a result of my visits, I have the following comments:

1. At the time of inspections, no active construction was occurring. Storm sewers had been installed. Pervious pavement and concrete curbs had been installed. The administration building was complete and occupied. The township still planned to find funding to lay asphalt north of the new building and the pervious pavement. Currently, this area is gravel/broken pavement. Flow monitoring equipment was being installed on April 3.
2. The majority of the site drains to a sediment settling pond in the north east side of the site. The pond was not discharging during either visit, although it was raining April 24. Soil stockpiles were located on the east side of the site. Perimeter sediment controls were not observed on the east and south sides of the stockpile. *Permit Requires:* Sheet flow from denuded areas shall be intercepted by sediment barriers. *This is a violation of Parts III.G.2.d.i. of the permit.*

Inlet protection was absent on April 3. While it is not required when there is a sediment settling pond downstream, the catch basin is tributary to the drainage tile passing through the aggregate for the pervious pavement. The inlet must be protected until a 70% density of vegetative cover has been established to protect the drainage system from clogging.

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3. While some method of stabilization had been applied to portions of the site, other areas remained bare. Bare soil was noted around the parking lot for the new building and on the banks and bottom of the pond. Bare soil stockpiles were observed on the east side of the site. These soils were weathered and rills had formed on the pond banks. Conditions appeared mostly unchanged from April 3 to April 24.

Permit Requires: Portions of the construction site that will be inactive for more than 21 days must have temporary stabilization initiated within the first seven. Permanent stabilization is required within seven days on any portion of the site that has reached final grade or will be idle for longer than one year. Permanent seeding and mulching is required before construction activity is completed throughout the entire site. *Failure to do so is a violation of Part III.G.2.b.i. of the permit.* At a minimum, some type of temporary stabilization must be applied to all bare idle areas and maintained. Erosion control blankets will need to be used on the banks of the detention pond.

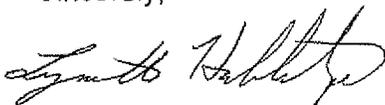
Please be aware that the CGP has recently been reissued. You will be notified in the near future on how to reapply for permit coverage. Under this next generation of the permit, you will be required to temporarily stabilize any portion of the site that will remain inactive for more than 14 days.

4. On April 24, overland flow was entering the sediment settling pond as concentrated flow in the southwest corner above the inlet. This was causing some erosion and must be fixed. *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. *These are violations of Parts III.G.2.b.ii. and III.G.2.c. of the permit.*

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 the actions.

If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette M. Hablitzel, P.E.
Division of Surface Water
Storm Water Program

/jlm

ec: Crystal Dymond, Storm Water Program Coordinator, Erie Soil & Water Conservation District
Eric Dodrill, Highway Superintendent, Perkins Township
Jack Farschman, PE, PS, Erie County Engineer
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