Ohio EPA
40 years and moving forward

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

June 5, 2013

Mr. Jack Chapman
Project Manager
Sargent Electric Company
5176 North Clinton Street
PO Box 5176Terre Haute, IN 47805

RE: Meldahl Hydroelectric Plant T-Line & Substation; NPDES Permit # 1GC04510*AG Construction Site Inspection

Dear Mr. Chapman:

On Thursday, May 30, 2013, I inspected the Meldahl Hydro Plant Transmission Line and Substation project in southern Clermont County, Ohio, to determine compliance with its NPDES construction site storm water discharge permit. I was accompanied by Eric Damian and James Schwieterman, who are doing summer internships with Ohio EPA's Division of Surface Water. Jeff Welsh from Sargent Electric and James Odneal, from SSOE Group, represented the project during this inspection.

Based on our observations, there were no significant violations of the site's construction storm water permit. But a couple of issues presented themselves that warrant some attention.

Silt fence was installed across the small creek on both sides of the new road constructed to access the site. Part III.G.2.d.v of Ohio EPA's construction permit (page 19) states that *"No structural sediment controls (e.g., the installation of silt fence or a sediment settling pond) shall be used in a surface water of the state."* Because the contractor was instructed by an inspector from Clermont County to replace the originally installed straw bales with silt fence, I am not citing this as a violation. Please note this prohibition for future projects that involve sediment controls and stream crossings.

In general, silt fence is not meant for use in areas where concentrated flow will occur, such as ditches or drainage swales. Even small streams can see enough flow following rainstorms to knock a silt fence down and carry it away, or undermine it by scouring the stream channel. If the silt fence remains standing, it often deflects water around its sides, accelerating erosion of the adjacent stream bank.

Ohio EPA also recommends against installing silt fence in areas where runoff has to go uphill to get to it. At this project, grades have changed in some perimeter areas so that bare ground is now below the level of adjacent silt fence, rendering the fence useless. Site designers often don't take such changes into consideration when adding erosion and sediment controls to a project's plans, which means on-site contractors (if they have the time), are free to determine more practical approaches.

Also note that small berms made of soil, woody debris or mulch can be just as effective in perimeter areas as silt fence, and often require less maintenance.

As a reminder, when the project is complete, and all areas of the site have been permanently stabilized with vegetation or other ground cover, the construction permit must be terminated. A "Notice of Termination" found at http://www.epa.ohio.gov/Portals/35/permits/General_NOT.pdf, must be completed and sent to Ohio EPA's Central Office at the address shown on page 2 of the NOT instructions.

If you have questions regarding the letter you can contact me at (937) 285-6442, or via email at chris.cotton@epa.ohio.gov.

Sincerely,

Chris Cotton
Environmental Specialist II
Division of Surface Water

CC/tb

cc: OEPA/SWDO/DSW Files

ec: Heath Wilson, Clermont County Building Department