Ohio EPA
40 years and moving forward

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

June 27, 2013

RE: LORAIN COUNTY
SHEFFIELD VILLAGE
BROOKSIDE HIGH SCHOOOL
NPDES PERMIT NO. OHC000003
OHIO EPA PERMIT NO. 3GC06330*AG
CONSTRUCTION STORM WATER

Mr. Tim Pelcic
Sheffield/Sheffield Lake City Schools
1824 Harris Road
Sheffield Village, OH 44054

Dear Mr. Pelcic:

On June 17, 2013, Ohio EPA conducted an audit of Sheffield Village and their Municipal Separate Storm Sewer System (MS4) Program. As part of the field review, our audit consisted of a site inspection of the Sheffield/Sheffield Lake City Schools New 7-12 Facility project located on Harris Road, North of the existing Brookside High School, Sheffield Village, Lorain County. Ohio EPA records indicate that the site is covered by the General National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Associated with Construction Activity (General Storm Water Permit), permit No. 3GC06330*AG. I was accompanied by Greg Kwasny of Sheffield Village during this inspection. While on site, I was able to speak with you as well as Paul Lenhard, Project Superintendent from Sona Construction LLC. The inspection documented the following deficiencies:

- The temporary sediment basins indicated on the Storm Water Pollution Prevention Plan (SWP3) in the northeastern corner of the site were never installed. Sediment basins as well as any other type of erosion and sediment control must be installed within seven (7) days of grubbing the site and *prior to any grading*. It was noted that the site has been active for several months and that issues with fly ash may have led to the delay of installing the sediment basins; however, no attempt was made to amend the SWP3 in order to provide appropriate sediment control until the fly ash issues have been resolved.

- The silt fence throughout the site needs to be repaired or replaced in many areas, particularly the western perimeter along the wetland preservation area. In addition, the silt fence was never properly installed. Referring to the detail drawings on the approved set of plans, the ends of two sections of silt fence must be wrapped together before staking to create a single continuous barrier (See Figure 1).

- The inlet protection for the yard drains and existing catch basins was inadequate or completely missing (See Figures 2&3). Inlet protection must be constructed per the detail drawing on the SWP3 including 2"x4" framing, chicken wire mesh, and geotextile fabric for all yard drains and catch basins. If Dandy Bags or another approved alternative are to be used on site, please be sure to indicate such amendments on the SWP3 on site. The BMPs must remain intact until all contributing drainage areas have been completely stabilized.

With that said, the inlet protection around the catch basins located along the sidewalk on the eastern perimeter of the site should be removed since a 70% or greater growth density has been established for all disturbed earth associated with the construction of the sidewalk (See Figure 4). Additional seeding and mulch should be applied as needed along the sidewalk upon removal of the inlet protection.

- Stabilization issues were apparent throughout the entire site, particularly the large stock piles and disturbed material which was visible just *outside* of the silt fence. Please note that any areas throughout the site (e.g. the stock piles) which shall remain idle for greater than twenty-one (21) days require temporary stabilization until final grading is completed and permanent seeding can be placed. Please notice (for future reference) that the requirements of the most recent NPDES General Construction Permit (OHC000004) have been updated such that any permits issued after April 21st of 2013 require temporary stabilization of any areas which shall remain idle for greater than *fourteen (14) days*. If such areas have been seeded but have difficulty establishing vegetation, watering may be required in addition to straw mulch or erosion matting as specified in the SWP3.

- It was observed while on site that dewatering practices were occurring (without appropriate dewatering techniques) and *discharging directly into the wetland preservation area* (See Figures 5&6). Please note that any dewatering must occur into a sediment basin or an approved dewatering bag on undisturbed earth. Please refrain from discharging into the wetland area immediately and ensure that dewatering only occurs in a manner as described above.

As a first incidence, the issues described above shall be considered deficiencies. Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Your response must be received and corrective action completed by **July 10, 2013**. If corrective action cannot be completed by this date, your response should indicate why, as well as include the date by when corrections will be completed. If a response is not received and/or a repeated incidence of the issues described in this letter occurs, these issues will escalate to violations and are subject to penalty as dictated by the Village of Sheffield Codified Ordinance Chapter 1375.99. Should you have any questions regarding this matter, please contact me at your earliest convenience at (330) 963-1125 or by e-mail at timothy.mcparland@epa.ohio.gov.

Sincerely,

Tim McParland
Assistant to the District Engineer
Division of Surface Water

TM:ddw

cc: Ken Kaczay, Village Administrator, Village of Sheffield
Paul Lenhard, Project Superintendent, Sona Construction LLC
ec: Dan Bogoevski, DSW, NEDO

Figure 1. The ends of the sections of silt fence should be twisted together before staking.

Figure 2. The yard drain requires inlet protection as depicted in the SWP3.

Figure 3. Inlet protection needs to be constructed per the detail drawing on the SWP3.

Figure 4. Inlet protection along the sidewalk can be removed since the adjacent areas have been stabilized.

Figure 5. Dewatering practices may only occur in conjunction with a dewatering bag on a stabilized surface or a sediment basin.

Figure 6. Discharging into the wetland area must stop immediately.