Ohio EPA
40 years and moving forward
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Richland County
Old Wooster Heights Elementary School/
New Madison Junior High School
Construction Storm Water
Facility ID No. 2GC03014

August 5, 2013

Mr. Lee Kaple
Madison Local School District
1379 Grace Street
Mansfield, Ohio 44905

Mr. John Harris
G. Stephens Inc.
133 North Summit Street
Akron, Ohio 44304

Dear Messrs. Kaple and Harris:

On July 11, 2013, Tom Wilkins and Zach Titkemeier inspected Old Wooster Heights Elementary School/New Madison Junior High School at 1419 Grace Street, Madison Township (photos taken). The purpose of the 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. The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. Mr. John Harris, Construction Manager for G Stephens Inc., provided information on the project.

Ohio EPA has not received a Co-Permittee Notice of Intent (NOI) application for this project. This form is used by construction site operators, as defined in Part VII.O. of the Construction General Permit (or CGP), to become co-permittees with the initial permittee of a construction site. Please note that Part II.A of the CGP requires all operators at a construction site to become co-permittees. Mr. John Harris, Construction Manager, indicated that G. Stephens Inc. is acting as general contractor and responsible for the day-to-day operation of the site. This letter serves to notify G. Stephens Inc. of these permitting obligations. Please submit a Co-Permittee NOI to this office or an explanation of why G. Stephens Inc. is not an "operator". Copies of the Co-Permittee NOI may be downloaded from our website at: http://epa.ohio.gov/dsw/storm/stormform.aspx.

As a result of the inspection, we have the following comments:

1. At the time of inspection, construction at the site was ongoing with exterior work and roofing being done on the school building. The soil stockpile north of the building was being removed from the site. The swale and detention pond on the east side of the site were finished and had been sodded.

2. A Storm Water Pollution Prevention Plan (SWP3) had been developed for the site and was available. After a cursory review of the SWP3, it appeared to complete and up to date. Inspection logs were kept, adequate, and available on site.

3. Inlet protection was observed on catch basins. Most of the site drained into an extended detention pond. The pond outlet had a perforated riser pipe and sediment deposition was evident in the pond. This structure is required to meet the design requirements for a sediment settling pond until construction activities have ended and a perennial vegetative cover of 70% density has been achieved over the tributary area. Without reviewing the] SWP3 in detail, we are unable to verify that the pond meets the requirements of the permit. Permit Requires: Concentrated runoff and runoff from drainage areas that exceed the design capacity of silt fence or inlet protection shall pass through a sediment settling pond. Also, common drainage locations serving an area with 10 acres or more disturbed at one time must have a sediment settling pond until final stabilization of the site. To qualify as a sediment settling pond, structures must meet the following specifications: a dewatering zone sized at 67 cubic yards per total contributing drainage acre; dewatering depth less than or equal to five feet (optimal depths are between three to five feet); for ponds serving five acres or more, the dewatering zone shall have a minimum 48 hour drain time; a sediment storage zone sized at 1,000 c.f. per disturbed acre; and the distance between inlets and the outlet at least 2:1 length:width ratio. Please see Part III.G.2.d.ii. of the permit. Please submit a response to this letter certifying that the pond does meet all of these requirements.

4. Soil stockpiles had been seeded and had grass growing. Sod had been laid in the detention pond and along the east swale. Soil had eroded from under the sod along the banks of the vegetated swale east of the building and a significant amount had deposited in the swale. Mr. Harris informed us that he had noticed the erosion issue and was in the process of addressing the problem so no further erosion takes place. Unstabilized soil with rills was observed on the north side of the site. 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. Temporary stabilization is required prior to the onset of winter weather for ground that will be idle over winter. 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. Please see Part III.G.2.b.i. of the permit. The erosion in the east swale must be fixed and the deposited sediment removed or stabilized.

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 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 Hablitzel, PE
Division of Surface Water
Storm Water Program

/jlm

ec: Tom Beck, PE, PS
John Hildreth, District Administrator, Richland SWCD
Tracking