

**Environmental  
Protection Agency**

2011 Governor  
2011 Lt. Governor  
2011 Director

July 27, 2011

RE: BEAVER PARK MARINA  
3GRM00020\*AG  
STORMWATER  
LORAIN

Mr. Bill Schaeffer  
Owner  
Beaver Park Marina  
6101 W Erie Ave  
Lorain, OH 44053

Dear Mr. Schaeffer:

On July 25, 2011 this writer conducted an inspection of your facility, located at 6101 W Erie Ave, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Marinas #OHRM00001 referenced above. Along with my observations from the inspection I have provided comments concerning your permit below:

**General Observations:**

1. Beaver Park Marina conducts maintenance, painting, sandblasting, and washing activities on boats in their marina. Maintenance and painting are mainly done indoors. Debris from sandblasting activities, although rare, are collected and disposed of properly. Boat washing is done near the lift and pure water is used in this process.
2. This marina has a total capacity of about 225 boats.

**Permit Violations:**

The following permit violations were noted:

1. **Failure to develop a Storm Water Pollution Prevention Plan (SWPPP).** This is a violation of Part IV.A.1 of the NPDES permit and Ohio Revised Code (ORC) 6111.04 and 6111.07. A copy of the SWPPP must be kept on-site at all times and made available to Ohio EPA upon request. The SWPPP was to be developed and implemented within 12 months of permit coverage, i.e., no later than January 28, 2009.
2. **Failure to conduct quarterly visual monitoring of storm water discharges.** This is a violation of Part V.A of the NPDES permit and ORC 6111.04 and 6111.07. Quarterly visual examination of storm water discharges from outfalls associated with industrial activity shall be performed and documented, except when the site is inactive and unstaffed and there are no industrial materials or activities exposed to storm water. The examination shall document observations

of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators of storm water pollution. Quarterly visual monitoring was to be initiated within 15 months of the date of permit coverage, i.e., no later than April 28, 2009.

3. **Failure to conduct routine facility inspections monthly to assess how well BMPs are operating.** This is a violation of Part IV.B.10 of the NPDES permit and ORC 6111.04 and 6111.07. Inspections shall include the boat washing area; blasting, sanding and painting areas; material handling areas; dry-dock areas and general yard areas. Inspection records are to be maintained and incorporated into the SWPPP.
4. **Failure to conduct a comprehensive site compliance evaluation once per year to assess the industrial activities at the marina contributing to storm water discharges.** This is a violation of Part IV.D of the NPDES permit and ORC 6111.04 and 6111.07. Records of the comprehensive site compliance evaluation could not be produced upon request. These records are to be kept at the marina at least 3 years from the date permit coverage expires or is terminated. Compliance evaluation reports are to be signed in accordance with Part VIX.G of the NPDES permit.
5. **Failure to keep training records with the SWPPP.** This is a violation of Part IV.B.11 of the NPDES permit and ORC 6111.04 and 6111.07. The SWPPP shall establish a schedule for training and training records shall be kept with the SWPPP. The club manager could not produce training records when requested.

**Action Items:**

1. Develop and implement an SWPPP for your facility. The SWPPP must contain a site map showing the following:
  - a. Outline of drainage areas for each storm water outfall.
  - b. Structural measures to reduce pollutants in storm water runoff (e.g. filter cloth barrier, vegetated buffer, etc.)
  - c. Location and name(s) of all surface waters of the state that receive discharges from the site.
  - d. Locations of all storm water conveyances including ditches, popes, and swales.
  - e. Locations of all non-storm water discharges.
  - f. Locations where any of the following activities are exposed to precipitation: fueling, engine maintenance and repair, boat washing, painting, sanding and/or blasting, welding and/or metal fabrication, loading/unloading areas, locations for storage of wastes, liquid storage areas (e.g. paint, solvents, etc.), and material storage area (e.g. blasting media, etc.).

Mr. Bill Schaeffer  
Beaver Park Marina  
July 27, 2011  
Page 3

A template to help you develop the SWPPP is available on our website at [http://www.epa.ohio.gov/dsw/permits/GP\\_Marinas.aspx](http://www.epa.ohio.gov/dsw/permits/GP_Marinas.aspx). Additional information can be obtained from the Ohio Department of Natural Resources Clean Marina Program at <http://www.ohioseagrant.osu.edu/cleanmarinas/>. Submit a copy of the signed SWPPP with your response to this letter.

2. Begin conducting quarterly visual monitoring of storm water discharges from outfalls associated with industrial activity and keep records of your observations with the SWPPP. If not previously started, quarterly visual observations should begin with the current quarter (July – September 2011). Samples should be taken from a storm event that produces 0.1-inch or greater precipitation that occurs at least 72 hours from the previous rain event that produced 0.1-inch or greater precipitation.
3. Begin conducting routine facility inspections on a monthly basis. If not already started, inspections should start in August 2011 to verify that the BMPs included in the SWPPP have been implemented.
4. Conduct a comprehensive site compliance evaluation by December 31, 2011.
5. Because your facility has more than 200 boat slips, wet and dry, you are subject to analytical testing, which I was told you already do. Please keep records of these tests with the SWPPP for review.
6. At the time of inspection it was unclear as to whether the trench drain in the engine maintenance building led to storm or sanitary sewer. Please research this information and if the drain goes to storm, it must be capped or redirected to sanitary.

**Recommended BMPs for the SWPPP:**

Please read the NPDES permit issued to you on January 28, 2008. It provides a description of the best management practices (BMPs) that you must include in the SWPPP and adopt at your facility. We noted that many of these BMPs are being implemented by Beaver Park Marina. However, we offer this list of additional BMPs you may wish to consider:

1. The used oil tote must be labeled as "used oil". Although, the area around the tote seemed clean and free of staining at the time of inspection, secondary containment of a tray or bermed pad should be provided to prevent oil from leaving the building should a spill or puncture occur.
2. A spill kit should be provided near the used oil tote. It should be clearly identified and members and staff should be trained on the proper use of spill response materials.

Mr. Bill Schaeffer  
Beaver Park Marina  
July 27, 2011  
Page 4

You are directed to send a copy of your completed and signed SWPPP to our office **no later than August 29, 2011**. If you wish to dispute any of the observations or violations noted above, please provide me with a letter of response no later than this same date.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email at [kelly.mcvay@epa.ohio.gov](mailto:kelly.mcvay@epa.ohio.gov). Should you have further questions after August 12, 2011, please contact Dan Bogoevski, also of the Division of Surface Water, at (330) 963-1145 or by email at [dan.bogoevski@epa.ohio.gov](mailto:dan.bogoevski@epa.ohio.gov).

Sincerely,



Kelly A. McVay  
Assistant to the District Engineer  
Division of Surface Water

KAM/mt