

**Environmental
Protection Agency**

Governor

Lt. Governor

Director

July 21, 2011

RE: EMERALD NECKLACE MARINA
3GRM00009*AG
STORMWATER
CUYAHOGA

Mr. Keith Kessler
Cleveland Metroparks
4550 Valley Parkway
Fairview Park, OH 44126

Dear Mr. Kessler:

On July 21, 2011 this writer conducted an inspection of your facility, located at 1500 Scenic Park Drive, Lakewood, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Marinas #OHRM00001 referenced above. Joe Anderson, of FDL Marine Services was present during this inspection. Along with my observations from the inspection I have provided comments concerning your permit below:

General Observations:

1. Emerald Necklace Marina stores, washes, and performs some maintenance on boats in their facility. Washing activities carried out by the marina use only pure water. Generally, the marina prefers to recommend outside companies for owners to take their boats to for maintenance, however, the marina still does some boat maintenance themselves. These maintenance activities carried out by the marina are done on-site on the asphalt surface outside of the garage. No staining was seen on this surface, indicating good housekeeping measures were being used diligently, and spill kits were located nearby.
2. The marina has a gas pump station, which is available to the public, equipped with clearly labeled shut off valves and spill kits.
3. Emerald Necklace Marina provides educational materials notifying boaters of Clean Marina and EPA standards and procedures.
4. When reviewing the Storm Water Pollution Prevention Plan (SWPPP), I was informed that The Cleveland Metroparks conduct most inspections for the facility and retain the records at their offices. Please note that copies of these inspection findings must also be kept on site with the SWPPP at the marina for review.

Permit Violations:

The following permit violations were noted:

1. **Failure to complete the site description.** As required in Part IV.B.2 of the NPDES permit, the site description portion of the SWPPP must be completed.

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2. **Failure to maintain a site map with the SWPPP.** As required in Part IV.B.3 of the NPDES permit, a copy of the site map must be kept with the SWPPP.
3. **Failure to maintain records and certification of Elimination of Unauthorized Discharges with the SWPPP.** As required in Part IV.B.5 of the NPDES permit, a signed copy of the Elimination of Unauthorized Discharges certification should be completed and kept with the plan for review.
4. **Failure to maintain records of Routine Facility Inspection, Comprehensive Site Compliance Evaluations, and Quarterly Visual Monitoring with the SWPPP.** As required in Part IV.B.10, Part IV.B.12.a, and Part IV.B.13, respectively, of the NPDES permit, a copy of the results from routine, quarterly, and annual inspections should be kept with the SWPPP for review.

Action Items:

1. Make aforementioned additions to the SWPPP. Please include a copy of the site map with the SWPPP which shows 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, pipes, 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.).

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.

Sincerely,



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

KAM/mt

cc: Joe Anderson, FDL Marine Services