



**Environmental  
Protection Agency**

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

July 12, 2011

RE: MENTOR HARBOR YACHTING CLUB  
3GRM00016\*AG  
STORMWATER  
LAKE

Mr. Alan Lesuer  
Harbormaster  
Mentor Harbor Yachting Club  
5330 Coronada Drive  
Mentor-on-the-Lake, OH 44060

Dear Mr. Lesuer:

On July 6, 2011 this writer and Dan Bogoevski, also of the Ohio EPA Division of Surface Water, conducted an inspection of your facility, located at 5330 Coronada Drive, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Marinas #OHRM00001 referenced above. Along with our observations from the inspection I have provided comments concerning your permit below:

**General Observations:**

1. While walking around the site we noticed a few areas of concern. Some of the dumpsters on site were left open (Figure 1). Dumpsters should be left lidded or under the cover of a tarp to prevent the collection of storm water and formation of leachates. Also, staining near the kitchen dumpster indicated some leaking may have occurred (Figure 2). Dumpsters should only be accepted if they are in good condition without holes and any spills from this area should be cleaned up using absorbent materials.
2. Sediments were beginning to collect around the storm drains in the parking lot area (Figure 3). To prevent these sediments from entering the storm drains filters could be installed in the drains, more gravel could be added to worn down areas nearby to cover loose particles, or a more frequent sweeping schedule could be adopted for this area.
3. There is a retail fuel station that can be used by the general boating public as well as members. Pumps are equipped with automatic shut-off nozzles. Emergency shut-off valves were labeled and easily identified. Spill kits were located in the attendant's office.
4. A sign should be put up next to the emergency shut of valve at the gas pumps so it can be easily located in the case of an emergency.
5. Any painting/scraping/sandblasting is done outdoors in a tarped off area. Tarps, containing all chips and particulate matter, are then disposed of.

**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. Mentor Harbor Yachting Club could not produce quarterly monitoring records when requested. 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. Training records could not be produced 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.

Mr. Alan Lesuer  
Mentor Harbor Yachting Club  
July 12, 2011  
Page 3

- 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.).

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. You will need to establish locations for the collection of storm water samples for the quarterly visual monitoring. Samples are only to be taken from discharges associated with industrial activity. Several areas that require sampling currently discharge runoff as sheet flow: the garage/blasting area and retail fuel station. See enclosed guidance on how to establish sample points.
6. Consider adding filters to parking lot drains or revising the sweeping schedule to keep sediments out of the drains.

Mr. Alan Lesuer  
Mentor Harbor Yachting Club  
July 12, 2011  
Page 4

**Recommended BMPs for the SWPPP:**

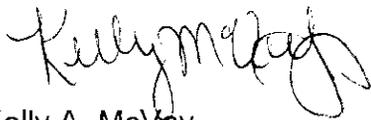
Please read the NPDES permit issued to you on January 28, 2008. It provides a description of the best management practices (BMPs) that you must include in the SWPPP and adopt at your facility. We noted that many of these BMPs are being implemented by the Mentor Harbor Yachting Club. However, we offer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

1. The club should distribute brochures, post signs, add clauses to membership contracts, or implement other methods of boater education to provide guidance on proper storm water pollution prevention practices and reinforce training. The Ohio Clean Marina Program often provides educational materials for your use. Adherence to the SWPPP should be a required clause in the membership contract.
2. As a members-only yacht club, member meetings are an ideal time to provide training. Training records can easily be generated by adding copies of meeting minutes to the SWPPP that indicate the storm water pollution prevention topic(s) covered at the meeting and a record of those in attendance.

You are directed to send a copy of your completed and signed SWPPP to our office **no later than August 15, 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.

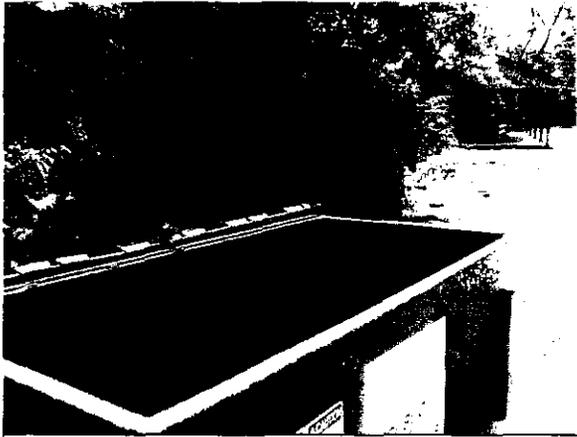
If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email at [kelly.mcvay@epa.ohio.gov](mailto:kelly.mcvay@epa.ohio.gov). You may also contact Dan Bogoevski at (330) 963-1145 or by email at [dan.bogoevski@epa.ohio.gov](mailto:dan.bogoevski@epa.ohio.gov).

Sincerely,



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

KAM/mt



**Figure 1:** Open dumpster on the west side of the facility.



**Figure 2:** Staining around the kitchen dumpster.



**Figure 3a:** Sediments washing towards a storm drain in the parking lot.



**Figure 3b:** Sediments built up around a storm drain in the parking lot.