

**Environmental
Protection Agency**

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

July 12, 2011

RE: RIVERBEND MARINA INC
3GRM00015*AG
STORMWATER
LAKE

Ms. Beth Macky
Riverbend Marina, Inc.
482 Blackbrook Road
Painesville, OH 44077

Dear Ms. Macky:

On July 11, 2011, this writer, accompanied by Jeff Herrington of Riverbend Marina, Inc., conducted an inspection of your facility, located at 1313 High Street in Fairport Harbor, 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:

Observations:

1. While walking around the site I noticed a few areas of concern. Several batteries were outside on a pallet between the two storage buildings. These batteries should be kept on the pallet with a roof or tarp covering them or they should be kept indoors.
2. The oil tank on the north side of the storage buildings should be within secondary confinement of a dike or tray in case of any spills or leaks.
3. At the time of inspection a few of the dumpsters were open and the one by the storage buildings and bathroom building was overflowing from the weekend. Dumpster lids should be left closed to prevent the collection of storm water and formation of leachates. Also, consider adding more dumpsters so trash from the weekend will fit into the bins without overflowing.
4. I was told that most owners do their own maintenance or hire contractors. If individuals are doing their own maintenance, it is the marina's responsibility to distribute brochures, post signs, add clauses into contracts, or implement other methods of education which provide guidance on proper storm water pollution prevention techniques along with unadvised activities which create waste water. For example, a clause could be added to the contract stating that boats should be washed with pure water, no soaps or chemicals should be discharged into the body of water, as they are considered waste waters. Also, a clause could be added regarding proper disposal of used oil. The Ohio Clean Marinas program is often able to provide educational materials for your use.

Permit:

1. As required in part IV of the NPDES permit, a Storm Water Pollution Prevention Plan (SWPPP) was to be created and implemented for your site by January of 2009. A SWPPP still must be created for your site. A template SWPPP can be found on the following web page:

http://www.epa.ohio.gov/dsw/permits/GP_Marinas.aspx

2. The plan must include a site map which shows:
 - 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.).
3. The SWPPP requires documentation of monthly routine facility inspections, monthly visual monitoring, and yearly comprehensive site compliance evaluations as stated in part IV.B.10, part IV.B.12.a, and part IV.B.13 of the NPDES permit, respectively. Furthermore, annual analytical monitoring is required as stated in part IV.B.12.b of the NPDES permit since this marina has over 200 boat slips.

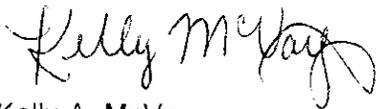
Action Items:

- Move batteries indoors or provide them with a covering.
- Provide secondary confinement for the oil tank.
- Keep dumpsters from overflowing and keep their lids shut.
- Create and implement a SWPPP.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of response and a copy of your completed SWPPP no later than August 8, 2011.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by e-mail at kelly.mcvay@epa.ohio.gov.

Sincerely,



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

KM:bo