



**Environmental
Protection Agency**

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

July 12, 2011

RE: SIMA MARINE SALES INC
3GRM00002*AG
STORMWATER
LAKE

Mr. John Sima
Owner
Sima Marine Sales, Inc.
200 Forest Drive
Eastlake, OH 44095

Dear Mr. Sima:

On June 6, 2011 this writer conducted an inspection of your facility, located at 200 Forest Drive, to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Marinas #OHRM00001 referenced above. Dan Bogoevski, of the Ohio EPA Division of Surface Water, was also present at this inspection. 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. At the time of inspection it was undetermined as to what the floor drains in the show room were connected to. Due to washing activities conducted in this area, if these drains discharge to a storm sewer system they must be either capped or redirected to sanitary sewers or a holding tank.
2. Fill was placed in a low spot located in "Area 51" (Figure 1). Vegetation should be planted on the filled area as soon as possible to prevent erosion and sedimentation. It appeared that the fill was placed near a wetland area. Please be aware that you are not permitted to place fill in wetlands and such an offense could be punishable by fines.
3. At the time of inspection it was believed that the floor drains in Building 1 went to a holding tank. This should be verified with plans and/or maps. If these drains do not go to a holding tank and are directed to a storm water system instead, they must be capped or redirected to sanitary sewer or a holding tank.
4. An outboard test tank located in Building 3 contained water which had contaminants from exhaust and other solids from the rusting steel tank floating on the surface (Figure 2). Staining indicated that this unclean water had been released from a hose coming out of the front of the building. As discussed, absorbent pads could be used to soak up some of the floating material on top of the water and the height of the hose could be adjusted to prevent the release of pollutants floating on the surface. Only pure water may be discharged to the outside of the building.
5. Various containers were located just off of the containment tray in Building 3. These should be moved onto another containment tray if they are not able to fit on the one nearby. Also, containers with used oil should be labeled as "Used Oil".

6. A general trash dumpster located behind Building 3 was left uncovered (Figure 3). All dumpsters should be kept covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.
7. Lots of staining and signs of spills were seen in the gas pump area, especially around the used oil tank (Figure 4). A spill kit was moved to this area. Good housekeeping methods should be implemented to clean any spilled materials in the future and to clean up the current spills. Furthermore, drums of antifreeze were open and outside of the covered area. Drums should be kept closed and stored under the roofed area on containment trays or indoors. Also, drums should have labels indicating their contents.
8. There was some staining along the edge of Building 2 (Figure 5). This area should be monitored to ensure no liquid is escaping from the building or seeping into the ground.
9. Contractors are often hired by members to wash boats. Contractors must sign in with the marina before beginning work.

Permit Violations:

The following permit violations were noted:

1. **Failure to complete the 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 rough copy of the SWPPP was available on site; however, it was not completed, implemented, or understood. 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. Sima Marine 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.

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, 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. 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. The tank containing used oil was labeled "Waste Oil". This tank must be label "Used Oil".
6. 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.
7. Find out where floor drains in the showroom and Building 1 lead to.
8. Cover area where land was filled with vegetation or other sediment controls.

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9. Make adjustments to the outboard test tank so polluted water is no longer discharged out of the building.
10. Label drums and keep them, along with any other containers with liquids, on a containment tray or within some other means of secondary confinement.
11. Clean up spills in the gas pump area.

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. You may also contact Dan Bogoevski at (330) 963-1145 or by email at dan.bogoevski@epa.ohio.gov.

Sincerely,



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

KAM/mt

cc: Vince Surance, Sima Marine



Figure 1: Area where fill was placed in a low spot of land.



Figure 2a: Outboard test tank.



Figure 2b: Staining where water is released from outboard test tank.



Figure 3: Uncovered general trash dumpster.



Figure 4a: Gas pump area. Staining and open drum are visible.



Figure 4b: Used oil tank. All tanks and drums should be labeled.

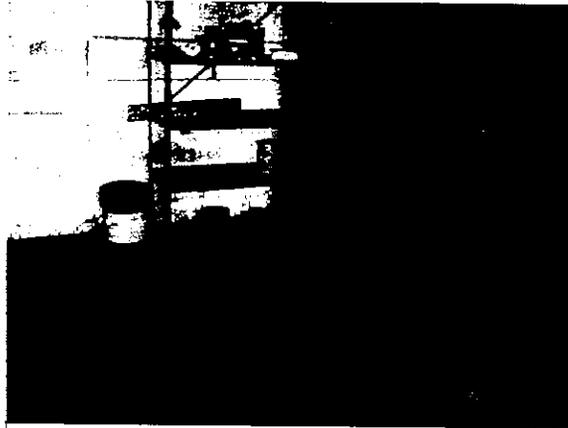


Figure 5: Staining along edge of Building 2. This area should be monitored.