



**Environmental  
Protection Agency**

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

August 1, 2012

RE: LAKE COUNTY  
EASTLAKE  
INDUSTRIAL STORM WATER  
SIMA MARINE SALES INC  
PERMIT NO: 3GRM00002

**NOTICE OF VIOLATION**

Mr. Vince Surance  
Sima Marine Sales, Inc.  
200 Forest Drive  
Eastlake, OH 44095

Dear Mr. Surance:

On July 24, 2012, this writer conducted an inspection of your facility, located at 200 Forest Drive, Eastlake, Ohio. This inspection was performed to follow-up on an inspection conducted last year by Kelly McVay and Dan Bogoevski on June 6, 2011. The purpose of these inspections are to determine compliance with the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Marinas. As a representative of Sima Marine Sales Incorporated, you were present during this inspection as well. Along with my observations from the inspection, I have provided comments concerning your permit below:

**Permit Violations**

1. **Failure to conduct quarterly visual monitoring of storm water discharges.** This is a violation of Part V.A of the NPDES permit and Ohio Revised Code (ORC) 6111.04 and 6111.07. Sima Marine has conducted quarterly visual monitoring in the year 2011, quarters three and four. No monitoring has been conducted in 2012. Quarterly visual examination of storm water discharges from outfalls associated with industrial activity shall be performed quarterly and documented, except when the site is inactive and unstaffed, and there are no industrial materials or activities exposed to storm water.
2. **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. Sima Marine has conducted monthly inspections in January, February and March of this year, but failed to continue performing monthly inspections of the facilities.
3. **Failure to implement Best Management Practices (BMP's) throughout the facility.** This is a violation of Part IV.A.1 of the NPDES permit and ORC 6111.04 and 6111.07.
  - a. From the 2011 inspection, Sima Marine was directed to determine where the floor drains in the Showroom and Building 1 lead to. Sima Marine has failed to determine where the Showroom drains lead to. It has been confirmed that the floor drains in Building 1 flow into a septic tank located to the northeast of the building. Please be aware that discharges associated with industrial activity, such as vehicle maintenance areas, cannot be discharged into a septic tank.
  - b. From the 2011 inspection, Sima Marine was directed to cover the general trash dumpster located behind Building 3. During the follow-up inspection, the

dumpster was uncovered (Figure 1). This dumpster must be kept covered with a lid or tarp to prevent the collection of storm water and the formation of leachates.

- c. In the oil area, drums containing antifreeze were lined along Building 2. Two of the drums were uncapped (Figure 2). The drums must be capped at all times, unless in the process of being loaded or unloaded. If you are loading or unloading antifreeze into these drums, they must be held under secondary containment or inside a building with no storm water floor drains.
4. **Failure to eliminate all unauthorized discharges.** This is a violation of Part I.C.4 of the NPDES permit and ORC 6111.04 and 6111.07. The outboard test tank, located in Building 3, contains water along with oils from boat motors and floating rust particulate from the rusting steel tank (Figure 3). Sima Marine indicated that when the tank is cleaned out, the floating solids are filtered out and the rest of the water is discharged outside of the building. There may still be pollutants, such as motor oil, gasoline and antifreeze, in the water. This discharge is not authorized under this permit and must be covered under a different NPDES permit or eliminated. This discharge can be eliminated by disposing it into a holding tank.

#### **General Observations**

1. In the oil area, next to Building 2, a blue used oil drum is held under secondary containment (Figure 4). The drum must be correctly labeled "Used Oil".
2. Fill has been placed at the base of the wooded area, downhill from the showroom (Figure 5). Vegetation must be planted on the loose soil as soon as possible to prevent erosion and sedimentation.
3. Spill kits should be available in the Showroom and in Building 1. A few oil leaks were spotted leaking from boat motors. Frequently check for motor leaks. When discovered, place a drip pan under the leak and properly clean and dispose of the leaked oil.
4. The fork lift vehicle in Building 1 was leaking oil. The oil must be properly cleaned up and disposed of immediately. A drip pan must be provided as soon as the leak is discovered. The vehicle must be repaired as soon as possible to stop it leaking.

#### **Action Items**

- Quarterly visual monitoring must be conducted once every quarter year and records of your observations must be kept with your Storm Water Pollution Prevention Plan (SWPPP).
- Routine facility inspections must be conducted once every month and records must be kept with your SWPPP.
- Determine where the Showroom floor drains lead to.
- Cover general trash dumpster with lid or tarp.
- Cap antifreeze drums and make aforementioned changes if loading or unloading from these drums.
- Label blue used oil drum, "Used Oil".
- Provide sediment and erosion controls to the filled area.
- Provide spill kits to Showroom and Building 1.
- Repair forklift vehicle.
- Eliminate the discharge of the outboard test tank water.

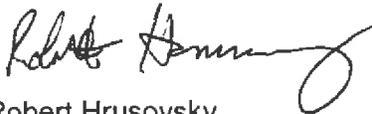
Please contact Marie Underwood, of the Ohio EPA Division of Surface Water, for further information on how to properly dispose of the contaminated water. You can contact Marie by phone at (330) 963-1185 or by email at [marie.underwood@epa.state.oh.us](mailto:marie.underwood@epa.state.oh.us).

SIMA MARINE SALES INC  
AUGUST 3, 2012  
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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 no later than August 20, 2012.

If you should have any questions concerning this letter, feel free to contact me at (330) 963-1128 or by e-mail at [robert.hrusovsky@epa.state.oh.us](mailto:robert.hrusovsky@epa.state.oh.us). You can also contact Dan Bogoevski, Ohio EPA, Division of Surface Water at (330) 963-1145 or by e-mail at [dan.bogoevski@epa.state.oh.us](mailto:dan.bogoevski@epa.state.oh.us).

Sincerely,



Robert Hrusovsky  
Assistant to the District Engineer  
Division of Surface Water

RH/cs

cc: John Sima, Sima Marine Sales, Inc.  
Mike Semik, Service Director, City of Eastlake

ec: Marie Underwood, Ohio EPA, NEDO, DSW

INSPECTION PHOTOS  
July 24, 2012  
Lake County



Figure 1  
General trash dumpster uncovered



Figure 2  
Uncapped antifreeze drum.



Figure 3  
Outboard Test Tank



Figure 4  
Unlabeled used oil drum.



Figure 5  
Area filled with soil.