



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

November 21, 2011

RE: CUYAHOGA COUNTY
CITY OF CLEVELAND
INDUSTRIAL STORM WATER
EDGEWATER YACHT CLUB

Terry Hynds, Chairman
Edgewater Yacht Club Inc.
6700 Memorial Shoreway NW
Cleveland, OH 44102

Dear Mr. Hynds:

On November 17, 2011, I met with you and other members of the Edgewater Yacht Club board of trustees as a follow-up to the inspection conducted July 26, 2011, by Kelly McVay, formerly of this office. Ms. McVay had identified a number of violations during her inspection, but the board had only recently become aware of them. This meeting was held to discuss a plan forward to correct the violations. Our records indicate that Edgewater Yacht Club Inc. received authorization to discharge storm water associated with industrial activity under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Marinas #OHRM00001 and is assigned a facility permit number of #3GRM00007*AG.

At our meeting, we agreed to the following:

- It was noted that Mike McElheny is no longer employed at Edgewater Yacht Club and should no longer be the contact for the NPDES permit. Until the board hires a new operations manager, Ohio EPA is to list Mr. Hynds as the facility contact.
- The facility has still not completed development of a storm water pollution prevention plan (SWPPP). The board agreed to finalize the SWPPP no later than December 9, 2011. A draft SWPPP was provided to me at the meeting.
- The facility has not yet conducted any quarterly visual monitoring or the annual analytical monitoring required by the NPDES permit. The board agreed to begin conducting the quarterly visual monitoring and annual analytical monitoring by December 31, 2011, weather permitting. It was further agreed that, in subsequent years, analytical monitoring will be conducted at a time of year that is more representative of marina operations. The board stated that May would be an optimal month in which to conduct future analytical monitoring.

- The facility requires monitoring for at least two outfalls, one at the Yard Building and another that is representative of maintenance activities which occur within the parking lot areas. The board believes that this second outfall will be one of the outfalls located between Dock A and Dock B. The sampling location will be finalized in the SWPPP by December 9, 2011.
- The facility has not yet conducted monthly routine inspections as required by the NPDES permit. The board agreed to begin conducting the monthly routine inspections by November 30, 2011, and will continue to conduct such inspections monthly as required by the NPDES permit. A record of the inspections and their findings will be kept on file with the SWPPP.
- The facility is conducting the Annual Comprehensive Site Evaluation for the year 2011 as part of the process of finalizing the SWPPP. The board was reminded to complete the Annual Comprehensive Site Compliance Evaluation Log contained in Part 13 of the SWPPP by December 31, 2011.
- The facility has not yet conducted training on storm water pollution prevention as required by the NPDES permit, however the board will provide members with an educational brochure developed by the Ohio Clean Marina program and will discuss the findings of Ms. McVay's inspection at the December 2011 general membership meeting. The board is reminded that the SWPPP must establish a schedule for training. The draft plan includes a detailed schedule for the year 2012 and a general commitment to on-going education of its members beyond that. It is recommended that at least some refresher training be scheduled each Spring prior to the start of boating season. The board asked if Ohio EPA could provide training resources such as videos and speakers. The board was referred to Pam Korenewych in our Office of Compliance Assistance and Pollution Prevention (OCAPP) at (330) 963-1237. OCAPP has a series of storm water pollution prevention videos in their loan library. The board was also referred to Colleen Wellington with the Ohio Department of Natural Resources Clean Marina Program at (419) 609-4120. ODNR can provide you with educational materials and may be able to provide educational presentations at future member meetings.
- Because much of the boat maintenance is conducted by third party contractors, the board has developed a list of approved maintenance contractors and is in the process of developing a certification that each must sign to pledge that they will abide by the best management practices contained in the SWPPP. A copy of the signed certifications should be kept on file with the SWPPP. Please provide Ohio EPA with a copy of the blank certification once it is finalized. This certification should be finalized prior to the start of the 2012 boat preparation season.

EDGEWATER YACHT CLUB
NOVEMBER 21, 2011
PAGE 3 OF 3

To ensure that Edgewater Yacht Club comes into compliance with the NPDES permit, please submit the following documentation to Ohio EPA no later than the specified date. A copy of the final, signed SWPPP shall be submitted no later than December 9, 2011. A copy of the logs for the annual comprehensive site evaluation for 2011, the quarterly visual monitoring for fourth quarter 2011, the analytical monitoring for 2011, and the routine site inspections for November 2011 and December 2011 shall be submitted no later than January 13, 2012. Further, include a copy of the pertinent section(s) of the meeting minutes for the December 2011 general members meeting by January 13, 2012. The blank contractor certification statement should be submitted by March 30, 2012.

If I have not correctly memorialized the outcome of our meeting, please provide me with a letter of response no later than December 5, 2011. Otherwise, please provide the requested documentation as specified in the preceding paragraph. Edgewater Yacht Club will remain in violation of the NPDES permit until this documentation is submitted. Failure to comply with the NPDES permit is a violation of Ohio Revised Code 6111.04 and 6111.07 and is punishable by fines of up to \$10,000 per day of violation.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



Dan Bogoevski
District Engineer
Division of Surface Water

DB/cs

cc: Colleen Wellington, Ohio Department of Natural Resources, Clean Marina Program

ec: Pam Korenewych, Ohio EPA, OCAPP, NEDO