



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Road  
Twinsburg, OH 44087-1924

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Laura H. Powell, Acting Director

January 10, 2007

RE: BLAIR RUBBER COMPANY  
CRO  
OHD 057 384 760  
SUMMIT COUNTY  
NOV/PRTC

Mr. Dave Jentzsch  
Blair Rubber Company  
5020 Panther Parkway  
Seville, OH 44273

Dear Mr. Jentzsch:

On December 28, 2006, the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection of Blair Rubber Company's (BRC) facility in Copley, Ohio. BRC was inspected to determine its compliance with Ohio's Cessation of Regulated Operations (CRO) laws as found in Chapter 3752 of the Ohio Revised Code (ORC) and Chapter 3745-352 of the Ohio Administrative Code (OAC).

BRC notified Ohio EPA of permanent CRO on November 22, 2006 (EPA form 0327) and December 20, 2006 (EPA form 0329). You represented BRC during the inspection.

Ohio EPA identified the following violation of Ohio's CRO laws:

1. OAC rule 3745-352-20(A)(2)(c):

The owner/operator must remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, and motor vehicles and rolling stock that contain or are contaminated with a regulated substance.

BRC failed to remove the following:

- Oil spillage mixed with floor dry located at the southwest corner of the facility;
- Oil spillage mixed with floor dry located at the Banbury Mixer;
- A 30-gallon drum containing sodium hydroxide in the Boiler Room; and
- Four 55-gallon drums containing wash water and soil from investigation and closure activities.

On December 29, 2006, you submitted information and photographs documenting: oil spillage/floor dry was cleaned up, the 30-gallon drum of sodium hydroxide was removed, a 55-gallon trash drum was removed, the Banbury muffler drum was removed, and the pipes in the Cement House were secured.

On January 4, 2006, Ohio EPA received documentation from SAS Environmental documenting that the drums of wash water and soil from investigation and closure activities were sent off-site for disposal as a non-hazardous waste.

**Ohio EPA's review of this documentation reveals that BRC has adequately demonstrated abatement of this violation.**

2. Concern: Generator Closure.

BRC completed generator closure activities at the former warehouse oil and hazardous waste storage area. However, documentation of generator closure activities was not available for review during the inspection.

**In order to address this concern, please submit documentation of generator closure activities for review within 30 days of the date of this letter.**

Enclosed you will find a copy of the checklist completed during the inspection. Should you have any questions, please feel free to call me at (330) 963-1278.

Sincerely,



Wade Balser  
District Representative  
Division of Hazardous Waste Management

Enclosure

WB:ddw

cc: Natalie Oryshkewych, DHWM, NEDO  
Annette Petranic, Summit County, LEPC  
ec: Ralph McGinnis, DHWM, NEDO

**NOTICE:**

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.