



**Environmental  
Protection Agency**

The Director, Governor  
Lt. Governor  
Director

July 14, 2010

RE: POLYMERICS INC  
3GR01046\*DG  
STORMWATER  
SUMMIT COUNTY

Mr. William Sanderson  
Environmental, Health and Safety Manager  
Polymeric Inc  
2828 Second Street  
Cuyahoga Falls, Ohio 44221

Dear Mr. Sanderson:

On July 12, 2010 this writer conducted an inspection of your facility, located at 2828 Second Street in Cuyahoga Falls, Ohio to determine compliance with your Industrial General Storm Water NPDES permit referenced above. The following observations were made:

General:

1. The site is a custom rubber mixing, dispersions, and chemical blends plant.
2. There are two loading docks on site, each equipped with both a catch basin and a "dead end" sump. If a spill were to occur, the catch basin could be closed and liquids would flow to the sump.
3. The material storage area is located behind the plant.

Inspection Observations:

1. Oil with lead content was being stored outside. Lead is classified as a Section 313 Water Priority Chemical and must meet the additional requirements specified in Section 7 of Part IV in NPDES Permit No.: OHR000004.
2. Waste oil covered the ground around the oil loading dock area. The storm drain located near the loading dock should be blocked off and the oil should be cleaned up immediately. To prevent oil from accumulating, a drip pan should be placed under the hose of the tanker to catch spills and leaks. Storm water from the catch basin should be monitored for oil sheen prior to discharging.
3. Nonhazardous oil totes were being stored outside. It is advised that all drums and/or totes, whether they contain product or waste material, be stored inside. If they must be stored outside, then it should be on an impervious bermed pad and under roof.

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Permit:

1. As required in Part IV of your permit, a Storm Water Pollution Prevention Plan (SWPPP or SWP3) needs to be created for your site. The following link to the USEPA Web site provides guidance on preparing a SWPPP.  
[http://www.epa.gov/npdes/pubs/industrial\\_swppp\\_guide.pdf](http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf)
2. The plan should contain a site map that shows the full site including contours of the site, direction of flow for storm water, the location of outfalls, location of possible contaminations to storm water, location of all surface water bodies, and any BMPs that are currently in place.
3. The plan should contain specific storm water annual training dates and verification that training was conducted with the employees.
4. The following link to the USEPA Web site contains information pertaining to different sectors covered under the General Industrial permit. The website has links to resources for you to use to keep your site in compliance with your NPDES permit.  
<http://cfpub.epa.gov/npdes/stormwater/swsectors.cfm>

Action Items:

- Move Section 313 water priority chemicals inside. If they must be stored outside, then it should be on an impervious bermed pad and under roof.
- Mitigate the oil loading dock area and take measures to prevent waste oil from accumulating on the dock.
- Submit a copy of your SWPPP when completed, but no later than September 31, 2010.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email [lindsey.olmstead@epa.state.oh.us](mailto:lindsey.olmstead@epa.state.oh.us).

Sincerely,



Lindsey A. Olmstead  
Assistant to the District Engineer  
Division of Surface Water

LAO/mt