



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

September 5, 2008

RE: CREST RUBBER  
PERMIT NO. 3IR00015  
PORTAGE COUNTY  
RAVENNA

Mr. David Clark, President  
Clark Rubber  
6408 Newton Falls Road  
Ravenna, Ohio 44266

Dear Mr. Clark

On September 3, 2008, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by you. The purpose of the inspection was to evaluate the operation and maintenance of the treatment system along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The plant design of the wastewater treatment system is 1500 gpd.
2. Currently the facility has 20 employees spread over three shifts.
3. Mr. Bob Andexler, employee, operates the wastewater treatment plant.
4. The blowers were not running thus the plant was not being aerated.
5. The contents of the aeration tank were light grey. This is typical of an underloaded plant.
6. Both the sludge return line and the skimmer return line were not functioning since the blowers were not operating.
7. The weirs and the sidewalls in the settling tank had moss growing on them. They should be scraped down, (see Figure 1).
8. The pumps were manually turned on to dose the surface sand filter beds. The effluent was light grey, (see Figure 2). This is due to the plant not being properly aerated.
9. Both surface sand filter beds were free of vegetation. Both filter beds were covered with a filter fabric and the plant effluent was dispersed on top of the filter fabric.
10. The chlorination unit and dechlorination units were not stocked with any tablets. However, the effluent in the chlorination chamber was clear and the bottom of the tank was visible.
11. The final effluent being discharged was clear and appeared to be of satisfactory visual quality.
12. No discharge was observed at outfalls 3IR00015003 and 3IR00015004.
13. A Web-based application for submitting the monthly operating report is currently available. Web addresses are available below which provide information on this topic along with training dates.

This office has recently reviewed your self-monitoring reports covering the period September 1, 2007 through July 31, 2008 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

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### Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	50060	Chlorine, Total Residue	1D Conc	0.019	.07	6/12/2008

### Frequency Violations

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
10/8/2007	002	00083	Color, Severity	1/Week	1	0
1/1/2008	002	00083	Color, Severity	1/Week	1	0
1/1/2008	002	01330	Odor, Severity	1/Week	1	0
1/1/2008	002	01350	Turbidity, Severity	1/Week	1	0

Please note that Ohio EPA has converted from the existing **SWIMware** software to a Web-based reporting system, **e-DMR**. The new reporting system is entirely Web based and accessible via any Internet connection. Ohio EPA Form 4500, commonly known as MORs, will now be called Discharge Monitoring Reports (DMRs or e-DMRs). User training is going to be available in October of this year. Please consult the following Web site for updates regarding the specific date:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMRtraining.html>

If you need additional information pertaining to the SWIMware replacement e-DMR, consult the following Web site.

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

**Please notify this office in writing within 14 days receipt of this letter your intentions to resolve items 4 through 10. This letter shall include a completion date. A follow-up inspection will be conducted subsequent to the completion date.**

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

*Michael W. Stevens*

Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt

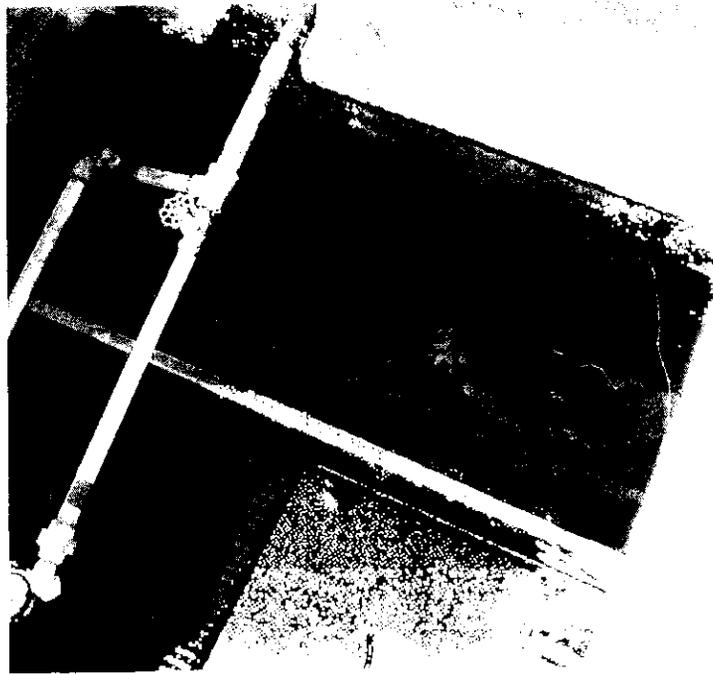


Figure 1



Figure 2