



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

April 2, 2010

RE: COLONIAL RUBBER
PERMIT NO. 3IR00032
PORTAGE COUNTY
RAVENNA

CERTIFIED MAIL

Mr. Steven Fosnight
Colonial Rubber
706 Oakwood Street
Ravenna, Ohio 44266

Dear Mr. Fosnight:

On February 23, 2010, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Alan Fosnight and you. The purpose of the inspection was to: (1) evaluate the performance of the wastewater 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 and (2) determine required additional actions to be undertaken as part of the permit renewal process.

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

1. The facility has 6 employees.
2. The last correspondence from this office dated February 11, 2009 indicated that no discharge monitoring reports have been submitted to this Agency since May 2004. You indicated that Colonial Rubber has resumed submitting monthly discharge monitoring reports in August 2009.
3. American Analytical has been hired to perform the analytical analysis.
4. You indicated that you collect the samples and ship them to American Analytical.
5. American Analytical provides the sample containers.
6. The pH is tested on site. This parameter is a field test which must be tested on site and not sent to the laboratory for analysis.
7. Delegation of authority to submit discharge monitoring reports for Ohio EPA surface water permits has been given to American Analytical.
8. The water used in the parts washer is the facility's only source of process water. City water is used for this operation. The parts washer is used to de-bur rubber parts. Fabric softener is added into the washer. You indicated that the parts washer uses less than 100 gallons per day. The discharge from the parts washer is sampled at station 3IR00032601.
9. The facility has two presses which operate via water hydraulics. Water is fed to a high pressure pump which provides the pressure to operate the press.

The water used to operate these presses does not come into contact with the rubber product and is classified as noncontact water.

10. Well water is used to operate the two water hydraulic presses.
11. The facility's other presses are operated by self contained oil hydraulic systems.
12. All noncontact cooling water and process water is collected in a cistern and then pumped to an above ground oil/water separator prior to being discharged to Waters of the State.
13. Outfall 3IR00032001 was observed. No visual impact to the receiving stream was observed.
14. All sanitary waste is tied into the sanitary sewers.
15. **The flow meter on the well is not functional. The flow meter should be replaced/repared immediately.**
16. **Approximately twenty drums of used oil were observed in the well building. A drum labeled methyl ethyl ketone was also observed. You indicated that Chemical Solvents came out and tested the drums and found halogens in it. It appears the drums may be contaminated and may be classified as hazardous waste. Mr. Harry Courtright from our Division of Hazardous Waste Management should be contacted to discuss your disposal options. Mr. Courtright can be contacted at (330) 963-1119.**

Please note that the following changes have been made in the facility's permit which has been public noticed:

1. Effluent loadings for outfall 3IR00032001 are based on a flow of 2000 gallons per day.
2. Effluent loadings for outfall 3IR00032601 are based on a usage of 100 lbs/day of raw material.

During the public notice period you will have 30 days to evaluate this permit and comment in writing any concerns you may have.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2009 through January 30, 2010 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:

Limit Violations

| Station | Reporting Code | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|---------|----------------|-----------|------------|-------|----------------|----------------|
| 001 | 00400 | pH | 1D Conc | 6.5 | 6.4 | 12/18/2009 |

Frequency Violations

| Station | Reporting Code | Parameter | Sample Frequency | Expected | Reported | Violation Date |
|---------|----------------|------------------------|------------------|----------|----------|----------------|
| 601 | 00530 | Total Suspended Solids | 1/2Weeks | 1 | 0 | 08/01/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/01/2009 |
| 601 | 00400 | pH | 1/Week | 1 | 0 | 08/01/2009 |
| 601 | 00550 | Oil and Grease, Total | 1/2Weeks | 1 | 0 | 08/01/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/08/2009 |
| 601 | 00400 | pH | 1/Week | 1 | 0 | 08/08/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/15/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/22/2009 |
| 601 | 00400 | pH | 1/Week | 1 | 0 | 08/22/2009 |
| 601 | 00530 | Total Suspended Solids | 1/2Weeks | 1 | 0 | 10/01/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/01/2009 |
| 601 | 00550 | Oil and Grease, Total | 1/2Weeks | 1 | 0 | 10/01/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/08/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/15/2009 |
| 601 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/22/2009 |
| 001 | 00530 | Total Suspended Solids | 1/2Weeks | 1 | 0 | 08/01/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/01/2009 |
| 001 | 00400 | pH | 1/Week | 1 | 0 | 08/01/2009 |
| 001 | 00550 | Oil and Grease, Total | 1/2Weeks | 1 | 0 | 08/01/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/08/2009 |
| 001 | 00400 | pH | 1/Week | 1 | 0 | 08/08/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/15/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 08/22/2009 |
| 001 | 00400 | pH | 1/Week | 1 | 0 | 08/22/2009 |
| 001 | 00530 | Total Suspended Solids | 1/2Weeks | 1 | 0 | 10/01/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/01/2009 |
| 001 | 00550 | Oil and Grease, Total | 1/2Weeks | 1 | 0 | 10/01/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/08/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/15/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 10/22/2009 |
| 001 | 00530 | Total Suspended Solids | 1/2Weeks | 1 | 0 | 11/01/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 11/01/2009 |
| 001 | 00550 | Oil and Grease, Total | 1/2Weeks | 1 | 0 | 11/01/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 11/08/2009 |
| 001 | 00400 | pH | 1/Week | 1 | 0 | 11/08/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 11/15/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 11/22/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 12/01/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 12/08/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 12/15/2009 |
| 001 | 50050 | Flow Rate | 1/Week | 1 | 0 | 12/22/2009 |

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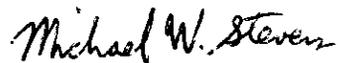
As previously noted, Colonial Rubber began submitting Discharge Monitoring reports in August 2009. However, this office has no record of receiving a discharge monitoring report for the month of September 2009. This discharge monitoring report should be submitted immediately.

Please notify this office in writing, within 14 days receipt of this letter, of your intentions to resolve items 15 and 16. This letter shall include a completion date for each item. 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
Environmental Engineer
Division of Surface Water

MWS/mt

pc: Mr. Harry Courtright, Ohio EPA, DHWM, NEDO

| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY |
|--|---|
| <ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. | <p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>C. Date of Delivery</p> |
| <p>1. Article Addressed to:</p> <p>Steven Fosnight Colonial Rubber P.O. Box 111 706 Oakwood St Ravenna OH 44266</p> | <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> |
| <p>2. Article Number (Transfer from service label)</p> | <p>7009 1680 0000 6381 4795 (Stevens 4/2/10)</p> |

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

7009 1680 0000 6381 4795

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PS Form 3800, August 2006 See Reverse for Instructions