



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

August 19, 2009

**RE: EMERALD PERFORMANCE MATERIALS LLC  
3IF00026\*GD  
SUMMIT COUNTY**

William Ramus  
HE& E Manager  
240 West Emerling Avenue  
Akron, Ohio 44301-1600

Dear Mr. Ramus:

On August 5, 2009, this writer conducted an inspection of your facility to determine compliance with the above referenced NPDES permit. Besides you, in attendance were David Rischar and Cory Harris, OEPA. Emerald Performance Materials is a manufacturer of specialty synthetic and rubber chemical additives located in Akron, Summit County.

Most wastewaters produced are discharged to the City of Akron sanitary sewers. These waters consist of process wastewater, tank dike water, boiler blowdown, coal pile run off, and sand filter backwash from the water treatment plant. Wastewaters generated and authorized for discharge under NPDES permit 3IF00026\*GD are non-contact cooling water and storm water. The source for the non-contact cooling water is from ground water wells and the Ohio Canal. For cooling purposes, the ground water wells are used during the summer months and the Canal used during the winter months. As part of the water treatment process, the non-contact cooling water is chlorinated. It is de-chlorinated prior to final discharge at outfall 001.

Inspection Observations

- On the day of my inspection outfall 001 was discharging. The discharge was clear and no visual problems were noted. There was no flow at outfalls 002 and 005.
- Outfall 003 contained a small amount of flow at a time when there has been no recent rainfall. The source of this water must be determined and relayed to this office.
- On the west side of building 321 a "Thermosol" heat exchanger is located. Within the dike for this heat exchanger an oily substance was observed. The gravel below the dike discharge valve was stained with the same material. The stained gravel and soils outside the dike must be removed and properly disposed. The oily material within the dike should also be removed. Until this occurs, no storm water that accumulates within this dike is authorized for discharge and will also have to be removed and properly disposed. The discharge valve must remain closed at all times and locked out.

- The concrete cover and surrounding area at the "Hill Diversion Pit" was stained with a product called "Super Light". This material should also be cleaned and removed for proper disposal as to not be exposed to storm water run off.
- A cursory review of your SWPPP plan was performed in your office. The plan appears to address all required items of a properly prepared SWPPP. We did request that you provide this office with a master site plan that clearly depicts all storm sewer catch basins, storm sewers, process sewers, storage locations of raw or waste materials, storm water and non storm water outfalls, and any other items pertinent to identifying the location of possible pollutant sources and their conveyance to waters of the state of Ohio via storm water run off.

A review of your compliance history as determined by our SWIMS compliance tracking system for the time period of October 2006 thru July 2009 indicated the following violations:

Numeric Violations

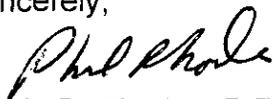
Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Chlorine, Total Residu	1D Conc	0.038	.135	8/4/2008
001	Chlorine, Total Residu	1D Conc	0.038	.09	8/6/2008

Frequency Violations

Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	Chlorine, Total Residu	3/Week	3	0	10/01/2006
001	pH	3/Week	3	0	10/01/2006
001	Chlorine, Total Residu	3/Week	3	0	10/08/2006
001	pH	3/Week	3	0	10/08/2006
001	Chlorine, Total Residu	3/Week	3	0	10/15/2006
001	pH	3/Week	3	0	10/15/2006
001	Chlorine, Total Residu	3/Week	3	0	10/22/2006
001	pH	3/Week	3	0	10/22/2006
800	Water Temperature	1/Week	1	0	02/22/2007

The NPDES permit expires on October 1, 2009. We are in receipt of your renewal application and anticipate drafting the renewal soon. If you should have any questions concerning any of the above, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.  
Environmental Specialist II  
Division of Surface Water