



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

February 4, 2009

RE: GOUGLER INDUSTRIES.  
PERMIT NO. 3IS00090  
PORTAGE COUNTY

Mr. Carl Lambert  
Manager Information Services  
FRD USA  
705 Lake Street  
Kent, Ohio 44221

Dear Mr. Lambert:

On January 7, 2009, an inspection of the above referenced facility was conducted. The facility was represented by you. The purpose of the inspection was to evaluate the facility's noncontact cooling water usages 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 facility's only source of discharge is stormwater. Previously, a water cooled air compressor discharged non-contact cooling. Ohio EPA's last inspection letter dated October 23, 2007, documented that this air compressor was permanently taken out of service.
2. Stark EnviroLabs Inc. performs the lab analysis. The lab provides the sample containers and shipping box. All samples are collected by Gougler's maintenance personnel.
3. You informed me that ph is tested at the lab. **Ph must be performed on site.**
4. **When an oil & grease sample is collected, it must be collected in a glass container with a teflon lined lid. The sample must also be preserved with sulfuric acid.**
5. All analytical data is submitted by you through Ohio EPA web-based application.
6. Floor drains exist in multiple buildings, however, these buildings each have oil/water separators connected to the floor drains.
7. All the building floor drains discharge to the facility's main oil/water separator which ultimately discharges through outfall 3IS00090001.
8. The effluent at sampling stations 3IS00090601 and 3IS00090001 were both clear and free of any oil sheen.
9. The facility stores kerosene and diesel in a diked area near the Kent Assembly Building. Stormwater/snowmelt within the dike area was observed discharging. You were advised to secure the dike area discharge pipe so no release could occur prior to a visual inspection conducted by trained personnel.
10. The facility has a stormwater Management Plan. You indicated via phone that this document has been reviewed and brought up to date for current operations.
11. Sampling shall be performed when discharging. If NO DISCHARGE OCCURS DURING THE ENTIRE MONTH, report "AL" in the first column of the first day of the month on the 4500 Form (Discharge Monitoring Report). The above language appears to not have been included in the permit.

MR. CARL LAMBERT  
FEBRUARY 4, 2009  
PAGE 2

This office has recently reviewed your self-monitoring reports covering the period September 1, 2007 through December 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:

#### Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
601	00045	Total Precipitation	1/Day	1	0	09/10/2007
001	00056	Flow Rate	1/Month	1	0	10/01/2007
001	00056	Flow Rate	1/Month	1	0	12/01/2007
601	00056	Flow Rate	1/Month	1	0	12/01/2007
001	00056	Flow Rate	1/Month	1	0	03/01/2008
601	00056	Flow Rate	1/Month	1	0	03/01/2008
001	00056	Flow Rate	1/Month	1	0	04/01/2008

**No limit violations were noted.**

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:bo