



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

June 30, 2011

RE: RCA RUBBER  
3IR00030 \*FD  
SUMMIT COUNTY

Mr. Gary Leiendecker, Chemist  
RCA Rubber  
1833 East Market Street  
Akron, OH 44305

Dear Mr. Leiendecker:

On June 30, 2011 this writer conducted a compliance evaluation inspection of your facility with yourself in attendance. Non-contact cooling water and filter backwash is discharged through five permitted outfalls (001, 002, 003, 004, and 007). The Little Cuyahoga River receives the discharge from these outfalls. Outfall 004 discharges the filter backwash.

#### Inspection Observations

- 1) All outfalls were flowing clear to the Cuyahoga River. No visual problems were noted.
- 2) During my last inspection, I noted drums of waste material stored outside and exposed to storm water. The quantity of drums either sealed or with open tops containing waste oils and solids appears to have substantially increased. This is not a good storm water management practice, especially in areas where an open storm sewer is present.
- 3) Noted since my last inspection was the active drum of lamp oil located inside a dike outside the main building. However, there were three full drums of lamp oil directly adjacent and not within a dike. An open storm catch basin is less than 25 feet away. This also is not good storm water pollution prevention practice.
- 4) I performed a cursory review of your Stormwater Pollution Prevention Plan (SWPPP) and noted that there were many updates that need to be made as the plan was dated 1993. I will be reviewing it in more detail and providing comments. Focus will be on the storage of raw and waste materials as the administrative portions appeared fairly complete.

A review of your monthly operating reports for the time period of August 2008 through May 2011, as identified by our SWIMS tracking system, revealed the following violations of the NPDES permit:

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RCA Rubber  
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### Numeric Violations

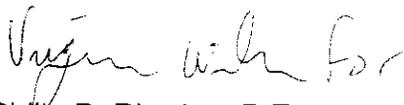
Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Water Temperature	1D Conc	65	70.	11/3/2008
001	Water Temperature	1D Conc	65	71.	11/4/2008
001	Water Temperature	1D Conc	65	66.	11/9/2009
001	Water Temperature	1D Conc	65	66.	4/24/2009
001	Water Temperature	1D Conc	65	70.	4/25/2009
001	Water Temperature	1D Conc	65	78.	4/27/2009
001	Water Temperature	1D Conc	65	74.	4/28/2009
001	Water Temperature	1D Conc	65	76.	4/29/2009
001	Water Temperature	1D Conc	65	72.	4/30/2009
002	Water Temperature	1D Conc	65	78.	4/27/2009
002	Water Temperature	1D Conc	65	75.	4/28/2009
002	Water Temperature	1D Conc	65	74.	4/29/2009
002	Water Temperature	1D Conc	65	75.	4/30/2009
001	Water Temperature	1D Conc	65	66.	4/25/2011
001	Water Temperature	1D Conc	65	69.	4/26/2011
001	Water Temperature	1D Conc	65	69.	4/27/2011
001	Water Temperature	1D Conc	65	71.	4/28/2011
002	Water Temperature	1D Conc	65	67.	4/27/2011

### Frequency Violations

None

I trust that the above is an accurate account of the inspection. If you should have any questions, feel free to contact this writer at (330) 963-1136.

Sincerely,



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

PPR/mt

File: Industrial/Permit Compliance

