



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

October 25, 2007

RE: PREFERRED RUBBER COMPOUNDING
3IR00023*GD
SUMMIT COUNTY

Mr. Don Burkholder
Plant Manager
Preferred Rubber Compounding Corp.
1020 Lambert Street
Barberton, OH 44203

Dear Mr. Burkholder:

On October 23, 2007, this writer conducted an inspection of your facility for the purpose of determining compliance with the above referenced National Pollutant Discharge Elimination System (NPDES) permit. At the time of the inspection the discharge from outfall 001 was flowing clear to Mud Run. A small area of iron staining was noticed immediately below the discharge. It did not continue downstream. This is a result of the non-contact cooling water source which is well water. This is the only permitted direct discharge from your facility. A picture is attached.

During the inspection it was noticed that a sump pump was pumping accumulated surface water to Mud Run from an old building located at the rear of the property near the canal. Is this your building? If it is please elaborate as to why the building is being pumped and identify what is being stored within the building as it relates to possible contaminants discharging to Mud Run. A picture is also attached for your reference.

A review of your self monitoring reports for the time period of May 26, 2006, through September 2007 indicates the following violations:

Frequency violations

| Violation Date | Station | Reporting Code | Parameter | Sample Frequency | Expected | Reported |
|----------------|---------|----------------|-------------------|------------------|----------|----------|
| 12/15/2006 | 001 | 50050 | Flow Rate | 1/2Weeks | 1 | 0 |
| 12/15/2006 | 001 | 00400 | pH | 1/2Weeks | 1 | 0 |
| 12/1/2006 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 12/15/2006 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 11/15/2006 | 001 | 50050 | Flow Rate | 1/2Weeks | 1 | 0 |
| 11/15/2006 | 001 | 00400 | pH | 1/2Weeks | 1 | 0 |
| 11/1/2006 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 11/15/2006 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 1/1/2007 | 001 | 50050 | Flow Rate | 1/2Weeks | 1 | 0 |
| 1/1/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |

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| Violation Date | Station | Reporting Code | Parameter | Sample Frequency | Expected | Reported |
|----------------|---------|----------------|-------------------|------------------|----------|----------|
| 1/15/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 2/1/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 2/15/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 3/1/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 3/15/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 5/15/2007 | 001 | 50050 | Flow Rate | 1/2Weeks | 1 | 0 |
| 5/1/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 5/15/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 4/15/2007 | 001 | 50050 | Flow Rate | 1/2Weeks | 1 | 0 |
| 4/1/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 4/15/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 7/1/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 7/15/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 6/1/2007 | 001 | 50050 | Flow Rate | 1/2Weeks | 1 | 0 |
| 6/1/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |
| 6/15/2007 | 001 | 00011 | Water Temperature | 1/2Weeks | 1 | 0 |

In our last letter dated May 16, 2006, we informed your facility that our tracking system indicated numerous frequency violations. They are still occurring. Please be aware that for a 1/2weeks frequency, SWIMS is looking for a sample during the period of day 1 through 14 and day 15 thru 28 for each calendar month. For example if you sample on the 30th and not during day 15 through 28, the tracking system will not recognize the sample as meeting the frequency requirement. You must adjust your sample days to fall within the time frames, otherwise it reports a violation.

If you should have any questions concerning the inspection or the sampling frequency, feel free to contact this writer at (330) 963-1136.

Sincerely,



Philip P. Rhodes, P.E.
Environmental Engineer
Division of Surface Water

PPR/mt

attachments

File: Industrial Permit/Compliance

