



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

September 2, 2008

RE: RCA RUBBER
3IR00030 *FD
SUMMIT COUNTY

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

Dear Mr. Leiendecker:

On August 29, 2008, this writer conducted a compliance evaluation inspection of your facility with yourself in attendance. Non-contact cooling water and filter backwash is discharged through four permitted outfalls (001,002, 003, 004, and 007). The Little Cuyahoga River receives the discharge from these outfalls. Outfall 004 discharges the filter backwash. The outfalls were flowing clear and there were no visual problems noted. As part of the inspection, we walked the exterior of the facility. Several areas were pointed out where drums, both full and empty were being stored close to open storm drains. A few drums were open at the bung hole. Drums containing waste should never be stored where they may leak or be accidentally tipped over, potentially spilling its contents into a storm drain. All drums containing waste should be stored inside within containment or outside under roof and within containment. Your NPDES permit renewal will contain stormwater language that mandates a best management practice plan that examines storage of waste materials exposed to stormwater and how to reduce potential for contamination. There was also a 50-gallon drum of white fuel (lamp oil) on small stand with a valve. This should also be stored inside and protected or outside within a diked area and a drip pan under the valve.

A review of your monthly operating reports for the time period of August 2006 through July 2008, as identified by our SWIMS tracking system, revealed the following violations of the NPDES permit:

Numeric Violations

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	Water Temperature	1D Conc	65	68.	12/19/2006
001	Water Temperature	1D Conc	65	66.	4/4/2007
001	Water Temperature	1D Conc	65	67.	4/24/2007
001	Water Temperature	1D Conc	65	66.	4/25/2007
001	Water Temperature	1D Conc	65	66.	4/27/2007

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Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Water Temperature	1D Conc	65	66.	4/30/2007
002	Water Temperature	1D Conc	85	86.	8/7/2006
002	Water Temperature	1D Conc	65	67.	11/14/2007
002	Water Temperature	1D Conc	85	86.	7/9/2007
002	Water Temperature	1D Conc	85	87.	6/2/2007
002	Water Temperature	1D Conc	85	88.	6/26/2007
001	Water Temperature	1D Conc	65	70.	4/22/2008
001	Water Temperature	1D Conc	65	69.	4/23/2008
001	Water Temperature	1D Conc	65	72.	4/24/2008
001	Water Temperature	1D Conc	65	70.	4/25/2008
001	Water Temperature	1D Conc	65	67.	4/28/2008
002	Water Temperature	1D Conc	65	68.	4/9/2008
002	Water Temperature	1D Conc	65	66.	4/21/2008
002	Water Temperature	1D Conc	65	72.	4/23/2008
002	Water Temperature	1D Conc	65	70.	4/25/2008

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 Engineer
Division of Surface Water

PPR/mlh

File: Industrial/Permit Compliance