



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

November 20, 2007

RE: RPM INCORPORATED
PERMIT NO. 3IN00255
MEDINA COUNTY

Mr. Dan Nayder, Plant Manager
RPM, Incorporated
2628 Pearl Road, P.O. Box 777
Medina, OH 44258

Dear Mr. Nayder:

On November 6, 2007, and November 7, 2007, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Bob Sweeney and you. The purpose of the inspection was to evaluate 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. Mr. Philip Cummings from the Medina County Sanitary Engineer's department oversees the operation of the wastewater treatment plant once per week.
2. The blowers were running and the plant was receiving good aeration.
3. The sludge return line was functioning properly; however, the skimmer return line was not functioning. Based on Mr. Cummings recommendation, the scum is pumped to a sludge holding tank in lieu of being returned to the aeration tank.
4. Both surface sand filter beds had a layer of sludge on them. This sludge should be removed and properly disposed.
5. The surface sand filter media was replaced in May 2007.
6. No scum build-up was present behind the baffle in the settling tank.
7. The weir in the settling tank had minimal scum build-up.
8. The facility's storm water pollution prevention plan was jointly prepared by Parson Engineering and RPM Incorporated personnel. The plan was last updated in July 2005.
9. Both outfalls 3IN00255003 and 3IN00255004 were inspected. The water accumulated in the sump pit for Outfall 3IN00255004 appeared to be visually okay. However, the water accumulated in the sump pit for outfall 3IN00255003 was grayish in color. You indicated that prior to releasing any water from outfalls 3IN00255003 and 3IN00255004 the pH is tested along with a sheen and odor test. If the storm water fails any of these tests the water is containerized and shipped to Enviroserve.
10. The groundwater remediation system was also inspected. No discharge was occurring at the time of the inspection.
11. You indicated that RPM Incorporated is looking into eliminating the groundwater remediation system and thus the elimination of outfall 3IN00255001.
12. Ohio EPA understands that sanitary sewers are now available to RPM Incorporated. Furthermore it is understood that RPM Incorporated is actively working with Medina County Sanitary Engineers Department to tie into the sanitary sewers. Please note that a permit-to-install application must be submitted to this office and approved prior to initiation of any construction.

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This office has recently reviewed your self-monitoring reports covering the period July 1, 2006, through September 30, 2007, 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:

Limit Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00400	pH	1D Conc	6.5	6.34	7/19/2006
002	31616	Fecal Coliform	30D Conc	1000	1360.	9/1/2006
002	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	7.05	10/1/2006
002	00610	Nitrogen, Ammonia (NH3	30D Qty	0.006	.06754	10/1/2006
002	80082	CBOD 5 day	30D Qty	0.057	.06035	10/1/2006
002	00610	Nitrogen, Ammonia (NH3	1D Conc	1.5	7.05	10/18/2006
002	00610	Nitrogen, Ammonia (NH3	1D Qty	0.009	.06754	10/18/2006
002	00530	Total Suspended Solids	30D Conc	11	20.	11/1/2006
002	00530	Total Suspended Solids	30D Qty	0.071	.08289	11/1/2006
002	80082	CBOD 5 day	30D Conc	8.8	18.7	11/1/2006
002	80082	CBOD 5 day	30D Qty	0.057	.0775	11/1/2006
002	00530	Total Suspended Solids	1D Conc	18	20.	11/10/2006
002	80082	CBOD 5 day	1D Conc	15	18.7	11/10/2006
002	00530	Total Suspended Solids	30D Qty	0.071	.11797	1/1/2007
002	00530	Total Suspended Solids	1D Qty	0.116	.11797	1/3/2007
002	00530	Total Suspended Solids	30D Conc	11	23.	2/1/2007
002	00530	Total Suspended Solids	30D Qty	0.071	.18308	2/1/2007
002	00610	Nitrogen, Ammonia (NH3	30D Qty	0.019	.023	2/1/2007
002	00530	Total Suspended Solids	1D Conc	18	23.	2/20/2007
002	00530	Total Suspended Solids	1D Qty	0.116	.18308	2/20/2007
002	00530	Total Suspended Solids	1D Qty	0.116	.14459	5/1/2007
002	00530	Total Suspended Solids	30D Qty	0.071	.14459	5/1/2007
002	80082	CBOD 5 day	30D Qty	0.057	.07519	5/1/2007
002	00530	Total Suspended Solids	30D Conc	11	36.	6/1/2007
002	00530	Total Suspended Solids	30D Qty	0.071	.2187	6/1/2007
002	00530	Total Suspended Solids	1D Conc	18	36.	6/12/2007
002	00530	Total Suspended Solids	1D Qty	0.116	.2187	6/12/2007
002	00300	Dissolved Oxygen	1D Conc	6.0	3.37	6/12/2007
002	50060	Chlorine, Total Residu	1D Conc	0.019	.06	7/10/2007
002	50060	Chlorine, Total Residu	1D Conc	0.019	.1	9/4/2007
003	00400	pH	1D Conc	6.5	6.41	8/16/2006
003	00400	pH	1D Conc	6.5	6.36	11/10/2006
003	00400	pH	1D Conc	6.5	6.47	4/9/2007
003	00400	pH	1D Conc	6.5	6.44	5/1/2007

Frequency Violations

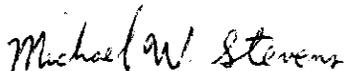
Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
7/1/2006	001	00056	Flow Rate	1/Month	1	0
8/1/2006	001	00056	Flow Rate	1/Month	1	0
9/1/2006	001	00056	Flow Rate	1/Month	1	0
10/1/2006	001	00056	Flow Rate	1/Month	1	0
11/1/2006	001	00056	Flow Rate	1/Month	1	0
12/1/2006	001	00056	Flow Rate	1/Month	1	0
1/1/2007	001	00056	Flow Rate	1/Month	1	0
5/1/2007	001	00056	Flow Rate	1/Month	1	0
6/1/2007	001	00056	Flow Rate	1/Month	1	0
8/1/2007	001	00056	Flow Rate	1/Month	1	0
7/1/2006	002	50060	Chlorine, Total Residu	1/2Weeks	1	0
11/15/2006	002	00300	Dissolved Oxygen	1/2Weeks	1	0
2/1/2007	002	00300	Dissolved Oxygen	1/2Weeks	1	0
4/15/2007	002	00300	Dissolved Oxygen	1/2Weeks	1	0
5/15/2007	002	50060	Chlorine, Total Residu	1/2Weeks	1	0
5/15/2007	002	00300	Dissolved Oxygen	1/2Weeks	1	0
6/15/2007	002	50060	Chlorine, Total Residu	1/2Weeks	1	0
6/15/2007	002	00300	Dissolved Oxygen	1/2Weeks	1	0
7/15/2007	002	50060	Chlorine, Total Residu	1/2Weeks	1	0
7/15/2007	002	00300	Dissolved Oxygen	1/2Weeks	1	0
9/1/2007	003	00056	Flow Rate	1/Month	1	0
3/1/2007	004	01300	Oil and Grease Severit	1/Month	1	0
9/1/2007	004	00056	Flow Rate	1/Month	1	0

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Please notify this office in writing within 30 days receipt of this letter with the facility's anticipated date for abandonment of the wastewater treatment system and connection into the sanitary sewers.

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/mt