



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

June 19, 2007

RE: RUBBER ASSOCIATES INC.  
3IR00058  
SUMMIT COUNTY

Mr. Kip Fioca  
Rubber Associates Inc.  
1522 W. Turkeyfoot Lake Rd.  
Barberton, OH 44203

Dear Mr. Fioca:

On June 15, 2007, this writer inspected your facility for the purpose of gathering information necessary to renew the above referenced National Pollutant Discharge Elimination System (NPDES) permit. The inspection will also serve as a compliance evaluation inspection.

Rubber Associates is a manufacturer of molded rubber parts for the rubber industry. Employed are approximately 95 persons, 24 hours/day, 5 days/week. Potable and process water is supplied by an on-site groundwater well. The following wastewaters are produced at your facility:

- Sanitary wastewater,
- Non-contact cooling water,
- Leakage of oil or hydraulic fluids from the presses,
- Chlorination of rubber products,
- Steam condensate from the boilers, and
- Ion exchange regeneration water.

**Treatment Provided**

- Sanitary wastewater is treated by a trash trap, 1,500-gpd extended aeration plant, and two 1,500-gallon leach wells.
- Non-contact cooling water is not treated and is discharged to the Rex Hill Road ditch.
- Oil water separation for oily water collected in the facility trench drains.
- Sodium Thiosulfate is used for dechlorination.

A review of the development document for your industry revealed that **your facility does generate process wastewater**. The process wastewater is leakage oil from heavy machinery which enters the floor drains, and after passing through the oil water separators, is discharged to the final outfall. You are therefore a primary industry and must complete Section V, Part C of the 2C application. Noted during the inspection was that your NPDES permit expires August 31, 2007. The renewal application was not submitted 180 days prior to this date and is a violation of the permit. You are directed to submit a complete application no later than July 23, 2007. Failure to meet this deadline may subject your company to an enforcement action to be initiated by this office to seek civil and monetary penalties as outline in Ohio Revised Code 6111.

Mr. Kip Fioca  
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At the time of the inspection no problems were observed with outfall 001. Below you will find a summary of violations as detected by our computer tracking system for the time period of August 2005 through April 2007:

**Numeric Violations**

Station	Parameter	Limit		Reported	Violation
		Type	Limit	Value	Date
001	pH	1D Conc	9.0	9.6	11/23/2005
001	pH	1D Conc	9.0	9.8	12/1/2005
001	pH	1D Conc	9.0	10.	9/8/2005
001	Oil and Grease, Total	1D Conc	10	11.5	9/22/2005
001	Oil and Grease, Total	1D Conc	10	11.9	10/5/2006
001	Oil and Grease, Total	1D Conc	10	11.2	10/19/2006

**Frequency Violations**

Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
9/22/2005	601	Flow Rate	1/Week	1	0
10/22/2005	601	Flow Rate	1/Week	1	0
3/31/2006	001	Flow Rate	1/Day	1	0
7/31/2006	001	Flow Rate	1/Day	1	0
10/31/2006	001	Flow Rate	1/Day	1	0
12/31/2006	001	Flow Rate	1/Day	1	0
12/22/2006	601	Flow Rate	1/Week	1	0
1/31/2007	001	Flow Rate	1/Day	1	0
1/22/2007	601	Flow Rate	1/Week	1	0
3/31/2007	001	Flow Rate	1/Day	1	0

If you should have any questions concerning the above feel free to contact this writer at (330) 963-1136.

Sincerely,



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

PPR/mt

File: Industrial Permit/Compliance