



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 12, 2009

RE: RUBBER ASSOCIATES INC.
3IR00058
SUMMIT COUNTY

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

Dear Mr. Fioca:

On March 6, 2009 this writer conducted an inspection of your facility as a follow-up to the release of oil on or about December 19, 2008. To summarize, the release was thought to have happened due to the oil/water separator being full of oil. This separator not only receives oily waters from the trench drains throughout the hydraulic press areas, but also non-contact cooling water and boiler blowdown. Reportedly, the separator had not been pumped in quite some time and the accumulated oil was pushed through with the non-contact cooling water flow.

It is not advisable to route relatively clean water such as once through non-contact cooling water through an oil water separator or any other non oily waters. We suggest that you reroute these waters around the oil/water separator and set up a written procedure that is tracked, to pump off accumulated oil on an appropriate periodic basis. Please keep a written record of this activity as it will be reviewed during all future inspections by this writer.

Noted during the inspection was the fact that a new mill has been installed that has substantially reduced the amount of cooling water flow discharged from your facility. Also production is down approximately 60 to 70%. Personnel are down to approximately 40 persons.

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 May 2007 through January 2009:

Numeric Violations

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Oil and Grease, Hexane	1D Conc	10	24.8	12/22/2008
001	Oil and Grease, Hexane	1D Conc	10	48.9	10/2/2008
001	Oil and Grease, Hexane	1D Qty	2.5	3.51664	10/2/2008
601	Oil and Grease, Hexane	30D Conc	8.9	9.6	11/1/2008



Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	Oil and Grease, Total	30D Conc	8.9	10.6	7/1/2007
001	pH	1D Conc	6.5	6.2	2/7/2008
001	pH	1D Conc	6.5	6.4	2/14/2008
001	Oil and Grease, Total	1D Conc	10	10.9	11/15/2007
001	Oil and Grease, Total	1D Conc	10	13.8	9/6/2007

Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00550	Oil and Grease, Total	1/Week	1	0	06/01/2007
001	00400	pH	1/Week	1	0	10/22/2007
001	00550	Oil and Grease, Total	1/Week	1	0	10/22/2007
001	00011	Water Temperature	1/Week	1	0	10/22/2007
601	50050	Flow Rate	1/Week	1	0	10/22/2007
001	50050	Flow Rate	1/Day	1	0	10/31/2007
001	00400	pH	1/Week	1	0	11/22/2007
001	00550	Oil and Grease, Total	1/Week	1	0	11/22/2007
001	00011	Water Temperature	1/Week	1	0	11/22/2007
601	50050	Flow Rate	1/Week	1	0	11/22/2007
001	80082	CBOD 5 day	1/Month	1	0	04/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	04/01/2008
601	00552	Oil and Grease, Hexane	1/Month	1	0	04/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	04/08/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	04/15/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	04/22/2008
001	80082	CBOD 5 day	1/Month	1	0	05/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	05/01/2008
601	00552	Oil and Grease, Hexane	1/Month	1	0	05/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	05/08/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	05/15/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	05/22/2008
601	00552	Oil and Grease, Hexane	1/Month	1	0	06/01/2008
601	50050	Flow Rate	1/Week	1	0	06/22/2008
001	80082	CBOD 5 day	1/Month	1	0	07/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	07/01/2008
601	00552	Oil and Grease, Hexane	1/Month	1	0	07/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	07/08/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	07/15/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	07/22/2008
001	80082	CBOD 5 day	1/Month	1	0	08/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	08/01/2008
601	00552	Oil and Grease, Hexane	1/Month	1	0	08/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	08/08/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	08/15/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	08/22/2008
001	80082	CBOD 5 day	1/Month	1	0	09/01/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	09/01/2008
601	00552	Oil and Grease, Hexane	1/Month	1	0	09/01/2008

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001	00552	Oil and Grease, Hexane	1/Week	1	0	09/08/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	09/15/2008
001	00552	Oil and Grease, Hexane	1/Week	1	0	09/22/2008
001	80082	CBOD 5 day	1/Month	1	0	10/01/2008
001	80082	CBOD 5 day	1/Month	1	0	11/01/2008

In addition, you have not been sending in the written non-compliance reports required when you experience a violation of your NPDES permit. This requirement can be found in Part II, section 12 of your permit. These are considered to be separate additional violations of your permit. 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