



State of Ohio Environmental Protection Agency

**Northeast District Office**

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Twinsburg, Ohio 44087

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

November 30, 2007

RE: RPM INTERNATIONAL INC.  
PERMIT NO. 3PR00395  
MEDINA COUNTY

Mr. Kenneth Armstrong  
RPM International Inc.  
2628 Pearl Road  
P.O. Box 777  
Medina, OH 44258

Dear Mr. Armstrong:

On November 6, 2007, an inspection of the above referenced facility was conducted. No one was present during the inspection. 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:

1. The blowers were running and the plant was receiving good aeration.
2. The contents of the aeration tank and settling tank were jet black. It is my understanding that activated carbon has been added to the treatment system. This is not a common practice for extended aeration package plants. Please explain the rationale behind this.
3. The sludge return line was functioning properly however the skimmer return line was not functioning.
4. Scum build-up was present behind the baffle in the settling tank (see Figure 1). This scum should be removed.
5. The weirs and the sidewalls in the settling tank also had scum build-up. They should be scraped down, (see Figure 1).
6. The surface sand filter bed in operation had vegetation growing in it (see Figure 2). The vegetation needs to be removed and properly disposed. Additionally, the surface sand filter bed media was black which indicates that the carbon is passing through the clarifier.
7. Ohio EPA understands that sanitary sewers are now available to RPM International Inc. Furthermore it is understood that RPM International Inc. is actively working with the 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.

This office has recently reviewed your self-monitoring reports covering the period June 1, 2007, 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:

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**Limit Violations**

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	12	48.3	6/1/2007
001	00530	Total Suspended Solids	7D Conc	18	48.3	6/1/2007
001	00530	Total Suspended Solids	30D Qty	0.068	.10969	6/1/2007
001	00530	Total Suspended Solids	7D Qty	0.102	.10969	6/1/2007
001	00610	Nitrogen, Ammonia (NH3	30D Conc	1.0	2.8	6/1/2007
001	00610	Nitrogen, Ammonia (NH3	7D Conc	1.5	2.8	6/1/2007
001	00610	Nitrogen, Ammonia (NH3	30D Qty	0.006	.00636	6/1/2007

**Frequency Violations**

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
6/8/2007	001	00010	Water Temperature	1/Week	1	0
6/8/2007	001	00083	Color, Severity	1/Week	1	0
6/8/2007	001	01330	Odor, Severity	1/Week	1	0
6/8/2007	001	01350	Turbidity, Severity	1/Week	1	0
8/8/2007	001	00010	Water Temperature	1/Week	1	0
9/15/2007	001	00010	Water Temperature	1/Week	1	0
9/15/2007	001	00083	Color, Severity	1/Week	1	0
9/15/2007	001	01330	Odor, Severity	1/Week	1	0
9/15/2007	001	01350	Turbidity, Severity	1/Week	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 an update on the facility's progress toward the abandonment of the wastewater treatment system and connection into the sanitary sewers. The letter should also address items 2 through 6.**

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,

*Michael W. Stevens*

Michael W. Stevens  
 Environmental Engineer  
 Division of Surface Water

MWS/mt

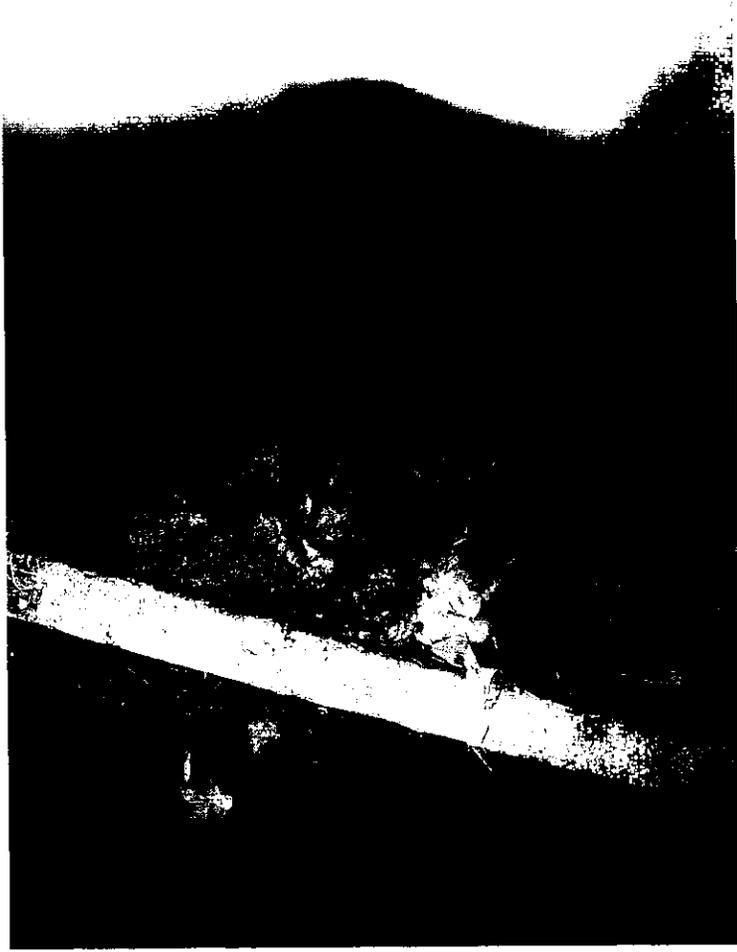


Figure 1



Figure 2