



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

February 8, 2012

RE: CREST RUBBER
PERMIT NO. 3IR00015
PORTAGE COUNTY
RAVENNA

Mr. David Clark, President
Clark Rubber
6408 Newton Falls Road
Ravenna, Ohio 44266

Dear Mr. Clark

On January 26, 2012, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by Mr. Eugene Davis, Class III Operator. The purpose of the inspection was to: (1) evaluate the performance of the wastewater treatment system along with the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted/discussed:

1. Mr. Eugene Davis from efdavis₂ & ASSOCIATES has recently been contracted to be in charge of the technical operations of the wastewater treatment plant.
2. Mr. Davis is also responsible for collecting the effluent samples and entering the analytical results into Ohio EPA's Surface Water Information Management System and pinning monthly electronic discharge monitoring report.
3. The plant design of the wastewater treatment system is 1500 gpd.
4. Currently the facility has nine employees.
5. In accordance with Ohio Administrative Code 3745-7-04, the sewage treatment facility is classified as a Class A facility. Once the facility's permit is renewed, the permittee shall ensure that the treatment works operator of record is physically present at the facility twice per week for a minimum of one hour per week.
6. The blowers were running and the plant was receiving good aeration.
7. The contents of the aeration tank were medium brown in color and no foam was present. This is typical of a properly operating plant.
8. The sludge return line was working properly and was returning medium brown water.

9. The skimmer return line was functioning properly and returning clear water.
10. The settling tank was free of any floating solids.
11. No scum/solids deposition build-up was present behind the baffle in the settling tank.
12. The weirs and the trough in the settling tank were also free of solids.
13. Both surface sand filter beds were free of vegetation. The beds were covered with a filter fabric and the plant effluent was dispersed on top of the filter fabric.
14. It was observed that the surface sand filter beds did not contain the correct filter media. The existing filter fabric along with the incorrect filter media should be removed and properly disposed at a licensed landfill.
15. Once the incorrect filter media is removed, it should be replaced with the correct filter media. In general 18 inches of approved filter sand is necessary. Any filter sand that is used must meet the requirements of Ohio Administrative Code 3745-42-09. More specifically, for conventional surface sand filters, filter sand shall be washed and free of silt; have an effective size of 0.4 mm to 1.0 mm; and have a uniformity coefficient less than 3.0.
16. The treatment system is equipped with both chlorination and dechlorination disinfection.
17. Please note that chlorination and dechlorination is required from May 1st through October 31st. Both the chlorination and dechlorination dispensing tubes should be appropriately stocked during this time period.
18. The effluent in the disinfection vault was clear and the bottom of the tank was visible.
19. No discharge was observed at outfall 3IR00015003.
20. It was discussed with both you and Mr. Davis about connecting the boiler blow down into the wastewater treatment system. Mr. Davis informed me that plans were being made to run piping overhead to the nearest drain connected to the wastewater treatment system. This connection will eliminate the need for monitoring station 3IR00015003 and the associated testing.
21. The facility's existing NPDES permit requires that a storm water pollution prevention plan (SWPPP) be developed to address each outfall that discharges to waters of the state that contains water associated with industrial activity. The plan was required to be completed within six months of the effective date of your permit. You indicated that this plan has never been prepared. A SWPPP should be prepared immediately.
22. The discharge from outfall 3IR00015004 was being pump from a plugged truck loading dock storm drain onto the adjacent land. The Division of Surface water has made the decision that outfall 3IR00015004 will be eliminated and be covered by the SWPPP requirements.

23. Subsequent to Mr. Davis taking over the technical operations of wastewater treatment system, the following actions were taken:

- A. The final clarifier was completely pumped out and cleaned. Large rocks were removed from the hopper. Mr. Davis has proposed to have the grates locked down. This is recommended for safety and to prevent vandalism. He has also proposed to cover the grates with screen covers.
- B. The contact relay for dosing pump #1 was replaced. Mr. Davis indicated that dosing pump #1 was not operable for four months due to the bad contact relay. However, dosing pump #2 was operable during this time period.
- C. Mr. Davis has indicated that the dosing tank needs to be cleaned out since pump #1 was inoperable for four months. He indicated that sediment has accumulated around this pump. This was confirmed by observing that the effluent being dosed to the sand filter bed is much dirtier than the water going over the weir in the settling tank.
- D. An obstruction in the sludge return line was removed. A 2" union was installed on this line to aid in future maintenance.
- E. Both the ¾" return activated sludge air supply line and the ¾" skimmer air supply line, were replaced.
- F. Hour clocks on the dosing pumps were ordered. Mr. Davis indicated that they will be installed once the weather permits.
- G. Mr. Davis maintains a log book on site which documents his time at the plant along with his duties performed.
- H. The trash trap was pumped out the first week of January 2012.

24. Please note the following includes some of the changes to the facility NPDES permit:

- A. A permanent marker at the outfall is required to be posted per the requirement of Part II of the facility's NPDES permit.
- B. A schedule of compliance will be placed in the permit renewal which requires the facility to meet E.Coli limits in the final table for outfall monitoring station 3IR00015002.
- C. Color, severity and odor, severity have been removed from station 3IR00015002.
- D. Outfalls 3IR00015003 and 3IR00015004 have been removed from the permit.

25. Once the facility's renewal permit is drafted it will be public noticed. During public notice, you will have a 30 day period to evaluate your permit and comment in writing any concerns you may have.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2008 through January 31, 2012 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	50060	Chlorine, Total Residue	1D Conc	0.019	0.18	8/13/2008
002	50060	Chlorine, Total Residue	1D Conc	0.019	0.13	6/2/2009
002	50060	Chlorine, Total Residue	1D Conc	0.019	0.22	8/18/2009
002	50060	Chlorine, Total Residue	1D Conc	0.019	0.26	6/18/2010
002	50060	Chlorine, Total Residue	1D Conc	0.019	0.25	8/10/2010

Code Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	31616	Fecal Coliform			AK	8/10/2010

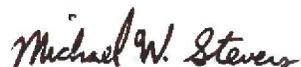
In addition to the above violations, this office has no record of receiving discharge monitoring reports for the months May 2011 through August 2011. **The missing discharge monitoring reports should be submitted immediately.**

Please notify this office in writing within 14 days receipt of this letter your intentions to resolve items 14, 15, 20 and 21. This letter shall include completion dates. A follow-up inspection will be conducted subsequent to the completion date.

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

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/cs

cc. Gene Davis, Class II Operator, efdavis₂ & ASSOCIATES