



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 7, 2012

RE: GEAUGA COUNTY
HEXPOL
NPDES # 31R00038

Ms. Robin L. Carney
Hexpol Compounding
Burton Rubber Processing
14330 Kinsman Road
Burton, OH 44021

Dear Ms. Carney;

On July 31, 2012, I met with you and Mr. Chuck Richardson to conduct an inspection of Hexpol and the wastewater treatment plant (WWTP) serving the facility. The intent of the inspection was to review operations and maintenance of the treatment system and gather information needed to issue the National Pollutant Discharge Elimination System (NPDES) permit.

Hexpol manufactures rubber compounds including custom mixed and blended special formula rubber compounds. Some molding and press operations are located onsite. The manufacturing facility includes general office space, production, warehouse and maintenance in three contiguous buildings. The facility operates three shifts, five days a week. The building employs a total of 223 employees.

The facility currently discharges treated wastewater from two extended aeration treatment system located onsite. The discharges from the facility include sanitary wastewater, non-contact cooling water and stormwater discharges. The final effluent from both WWTPs and the oil/water separator is discharged to an unnamed tributary to the East Branch of the Cuyahoga River. Outfall 004, which includes stormwater only, discharges to the East Branch of the Cuyahoga River. Outfall 003, which includes stormwater only, discharges to a storm channel located in front of the facility, along State Route 87.

INSPECTION

Below are the findings and recommendations from the inspection:

The sanitary sewer discharge is directed to a flow splitter at the headworks of the WWTPs. The discharges from the non-contact cooling water are collected and discharged via outfall 605, which enters the siphon dam. All discharges from the site, except outfalls 004 and 003, are sent through the oil/water separator associated with the siphon dam. A second oil water separator is located adjacent to the above ground storage tank farm and tanker unloading area and is monitored through outfall 602.

The wastewater treatment system consists of two separate extended aeration treatment plants, one sludge holding tank, a flow splitter, surface sand filters divided into four equal compartments, chlorination and dechlorination and an effluent pump station. All solids removed from the system are hauled by Tim Frank Septic. The skimmings from the oil/water separators are hauled offsite.

At the time of the inspection, all treatment units were in operation and appeared to be well maintained. There are two blowers provided for each treatment system. The aeration tank portion of each system appeared to be in satisfactory condition. Each aeration tank appeared to be provided with an adequate amount of air and the rollover within the tank was satisfactory. The contents of the aeration tank appeared to be a chocolate brown color and there was no foam present. The clarifier portion of each treatment system contained a solids buildup on the influent baffles, effluent weirs and on the surface of the tanks. The clarifiers must be cleaned regularly to prevent solids buildup and the sidewalls should be scraped down to maintain the circulation of solids to the aeration portion of the system.

The newer treatment system also contains a filtration system consisting of four upflow filtration units. The filters appeared to be in satisfactory condition. It is understood the media is changed approximately three to four times a year.

The pump stations appeared to be in satisfactory condition and the pumps were operational. The surface sand filters appear to be in satisfactory condition. The filter sand was clean and free of solids accumulation or vegetative growth. The sand filter splitter box has been upgraded and is in satisfactory condition.

The chlorination and dechlorination is operational and the effluent from the tank appeared clear and free of solids and foam. The effluent pump station appeared to be in satisfactory condition. The final outfall and the receiving stream appeared to be in satisfactory condition.

The stormwater outfalls were inspected and found to be in satisfactory condition. Most of the stormwater outfalls included a boom to collect any potential oil that may be present in the discharge. This office has some concern about an oil sheen noticed at outfall 003. This outfall collects runoff from the parking lots and loading dock areas. It is understood a boom will be placed at this outfall, similar to the other stormwater outfalls located throughout the site.

NPDES PERMIT

Discharge monitoring reports from January 1, 2009 through July 1, 2012 were reviewed for compliance with the current NPDES permit. The violation summary was reviewed during the inspection and has been attached for your records. Please review the violation summary and notify this office if any errors are noted.

As discussed during the inspection, the NPDES permit application contains some errors that must be corrected. The following items must be revised in the NPDES permit application:

- 1) Outfall 003, 004, 604 are not shown on Form 2C in the outfall description section. These outfalls must be listed because they will be included in the renewal NPDES permit.
- 2) The outfall description, as shown in Form 2C of the NPDES permit application states outfall 603 is "treated wastewater and surface water into the pond used for fire water". However, Part II of the current NPDES permit and Figure 3 of the NPDES permit application, show outfall 603 to be located after the pond. Please update the NPDES permit application so it represents the actual location of outfall 603 and maintains consistency within the permit application.

Operator Certification

The WWTP is currently classified by the Ohio EPA as a Class I wastewater treatment works. The renewal NPDES permit will include language in Part II that will update the classification of the WWTP to a Class A wastewater treatment works. It is understood the facility is currently served by Jeffrey Turk, a Class 3 Operator. The Operator of Record (ORC) form must be submitted for the operator. An ORC form has been enclosed with this letter. The operator and the facility owner must complete the enclosed ORC form and submit to this office.

It is understood Mr. Richardson is interested in obtaining a Class A operator license. Information regarding Class A licensing can be found at:

<http://www.epa.ohio.gov/dsw/opcert.aspx>

Information regarding free Class A Wastewater Training can be found at the above noted website.

This office must receive the completed and signed Hexpol ORC form as soon as possible but no later than August 24, 2012.

Non-Contact Cooling Water

The facility uses additives in the non-contact cooling water system. The NPDES permit will require the facility to obtain written approval from the director of Ohio EPA prior to using non-contact cooling water additives, which discharge to waters of the state. More specifically, the NPDES permit will include the following language, which is also in the current NPDES permit:

"In the event that the permittee's operation requires the use of cooling water or boiler water treatment additives that are discharged to surface waters of the state, written permission must be obtained from the director of the Ohio EPA prior to use. Reporting and testing requirements to apply for permission to use additives can be obtained from the Ohio EPA, Central Office, Division of Surface Water, Water Resources Management Section. Reported information will be used to evaluate whether the use of the additive(s) at concentrations expected in the final discharge will be harmful or inimical to aquatic life."

In 2005, the facility submitted a non-contact cooling water additive written request to the Ohio EPA, Division of Surface Water, Central Office. To date, our records do not indicate the facility has obtained a formal written approval from the Director of Ohio EPA. Prior to issuing an NPDES permit for a discharge which includes non-contact cooling water additives, the Directors Final Findings and Orders must be issued. The formal submittal process has been attached to this letter. The MSDS sheets and concentration rates for each additive must be submitted along with a written summary of the process.

Stormwater

The facility has submitted an NOI for coverage under an Industrial Stormwater General Permit. Because the facility already submitted an application for coverage under an Individual NPDES permit, the stormwater coverage shall be included in the Individual NPDES permit. The stormwater language that will be included in the individual permit will be located in Parts 4, 5 & 6 of the NPDES permit.

SUMMARY

In summary, the following items must be completed within the required deadline:

- 1) The facility must obtain written permission from the Director of Ohio EPA to discharge non-contact cooling water treated with additives. The formal request, along with MSDS sheets and concentration used of each additive, must be sent to Central Office, DSW. Hexpol must submit this formal request for the director's approval as soon as possible but no later than August 27, 2012. The request must be submitted to:

Ohio EPA, Central Office, DSW
Attention: Eric Nygaard
Water Resources Management Section
P.O. Box 1049
Columbus, OH 43216-1049

- 1) The facility must submit the ORC form for the current operator as soon as possible but no later than August 24, 2012.

Your NPDES permit will be public noticed once these above noted items are addressed. Once the permit is public noticed, you will have 30 days to make any comments. If you have any questions or comments regarding this letter, please contact this office at (330) 963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/cs

Attachment: Violation summary

cc: Geauga County Health Department

File: Industrial/Hexpol 3IR00038

NPDES Permit Violations

Discharge Violations:

Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2009	001	00400	pH	1D Conc	9.0	11.	1/6/2009
January 2009	601	00400	pH	1D Conc	9.0	11.	1/6/2009
January 2009	001	00400	pH	1D Conc	9.0	10.	1/13/2009
April 2009	001	00400	pH	1D Conc	9.0	9.6	4/9/2009
May 2009	001	00400	pH	1D Conc	9.0	10.	5/5/2009
May 2009	001	00400	pH	1D Conc	9.0	9.8	5/14/2009
August 2009	601	00300	Dissolved Oxygen	1D Conc	6.0	5.29	8/18/2009
December 2009	601	00300	Dissolved Oxygen	1D Conc	6.0	5.96	12/16/2009
December 2009	601	00300	Dissolved Oxygen	1D Conc	6.0	5.86	12/22/2009
December 2009	601	00300	Dissolved Oxygen	1D Conc	6.0	5.75	12/29/2009
June 2010	601	00400	pH	1D Conc	6.5	6.4	6/24/2010
July 2010	001	00400	pH	1D Conc	6.5	6.	7/7/2010
July 2010	601	00400	pH	1D Conc	6.5	6.1	7/7/2010
July 2010	001	00400	pH	1D Conc	6.5	6.4	7/21/2010
August 2011	601	31616	Fecal Coliform	30D Conc	1000	1230.	8/1/2011
October 2011	601	31616	Fecal Coliform	7D Conc	2000	2880.	10/1/2011
December 2011	601	00530	Total Suspended Solids	30D Qty	0.64	.84784	12/1/2011
January 2012	601	00530	Total Suspended Solids	30D Qty	0.64	.70363	1/1/2012

Frequency Violations:

Reporting Period	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2009	001	50050	Flow Rate	1/2Weeks	1	0	5/15/2009
May 2009	001	00400	pH	1/2Weeks	1	0	5/15/2009
March 2009	601	00083	Color, Severity	1/Day	1	0	3/29/2009
March 2009	601	00083	Color, Severity	1/Day	1	0	3/30/2009
March 2009	601	00083	Color, Severity	1/Day	1	0	3/31/2009
March 2009	601	01330	Odor, Severity	1/Day	1	0	3/29/2009
March 2009	601	01330	Odor, Severity	1/Day	1	0	3/30/2009
March 2009	601	01330	Odor, Severity	1/Day	1	0	3/31/2009
March 2009	601	01350	Turbidity, Severity	1/Day	1	0	3/29/2009
March 2009	601	01350	Turbidity, Severity	1/Day	1	0	3/30/2009
March 2009	601	01350	Turbidity, Severity	1/Day	1	0	3/31/2009
March 2009	601	50050	Flow Rate	1/Day	1	0	3/29/2009
March 2009	601	50050	Flow Rate	1/Day	1	0	3/30/2009
March 2009	601	50050	Flow Rate	1/Day	1	0	3/31/2009
May 2009	601	00010	Water Temperature	1/Week	1	0	5/15/2009
May 2009	601	00300	Dissolved Oxygen	1/Week	1	0	5/15/2009