



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

April 22, 2013

RE: RUBBER ASSOCIATES INC.  
PERMIT NO: 3IR00058  
SUMMIT COUNTY

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

Dear Mr. Fioca:

On April 16, 2013, 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 30 persons, 24 hrs/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
- Boiler blowdown
- Non-contact cooling water
- Leakage of oil or hydraulic fluids from the presses
- Chlorination of rubber products
- Ion exchange regeneration water
- Washwater from cleaning/processing rubber molded parts

#### Treatment Provided

- Sanitary wastewater is treated by a trash trap, 1500 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 thru the oil water separator, is discharged to the final outfall. Therefore, you are a primary industry and must complete Section V, Part A, B, and C. During our meeting, we specifically went over all the analysis that were missing in your current application and must be included to be considered a complete application. The aforementioned only applies outfall 001. As we discussed, since you have not been cooling parts and using outfall 601, you are not required to provide a monthly analysis. Check no flow on the electronic Discharge Monitoring Report (e-DMR) form each month. If you wish to begin

this operation again in the future, you must comply with the monitoring required and also update you NPDES permit application.

Noted during the inspection of the exterior of the building, the dumpster area was found to be unacceptable. Oil, oil stained soils and trash was observed in around the dumpsters. The dumpsters were not covered and it was obvious that they are not leak proof. A picture is attached for reference. The dumpsters must be kept covered at all time when not in use and must be leak tight. The contaminated soils must be removed and properly disposed. This must be done no later than May 10, 2013. I will be re-inspecting on or after that day to make sure this has been done.

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 January 2011 thru March 2013:

**Numeric Violations**

None

**Frequency Violations**

None

Also, the results for CBOD for the past two years indicate that it has not shown up past detectable amounts. It will be removed from outfall 001 upon permit renewal. Your permit is expired the application is incomplete and late. You are requested to update the application with required testing no later than May 10, 2013.

If you should have any questions concerning the above, feel free to contact this writer at (330) 963-1136 or by e-mail at [phil.rhodes@epa.state.gov](mailto:phil.rhodes@epa.state.gov).

Sincerely,



Philip P. Rhodes, P.E.  
Environmental Specialist II  
Division of Surface Water

PPR/cs

Attachments: Pictures

File: Industrial Permit/Compliance

