



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

August 6, 2013

RE: KARMAN RUBBER  
3IR00102\*BD  
SUMMIT COUNTY  
AKRON

Stephanie Brown  
Karman Rubber Company  
2331 Copley Rd.  
Akron, Ohio 44320

Dear Ms. Brown:

On August 1, 2013, this writer conducted a compliance evaluation inspection of your facility as it relates to National Pollutant Discharge Elimination System (NPDES) permit 3IR00102\*AD. Below you will find a summary of the inspection:

#### **General**

Karman Rubber produces a variety of rubber products used as vibration dampeners. Current employment is 23 employees. Water for production and drinking water is supplied by two on-site ground water wells. There are no showers. City water is available at the street, but is not used. Sanitary sewers are not available.

#### **Wastewater Generated by outfall**

001: Discharge is non-contact cooling water, boiler blowdown and backwash from two ion exchange water softeners. Contact cooling water from the extruder cooling water trough is rarely discharged, but is still authorized by the NPDES permit.

002: Once thru non-contact cooling water to cool hydraulic pumps. The outfall is from what appears to be a 12 pipe submerged in a small pool. It was flowing clear and cool at the time of the inspection.

003: Non-contact cooling water cooling the rollers for the mill.

004: There was no flow at the time of the inspection. Historically this outfall contained non-contact cooling water from injection presses.

#### **Treatment Provided**

The non-contact cooling water and the boiler blow down are routed thru a concrete below grade tank located at the northwest corner of the property. Reportedly, the tank is baffled to act as an oil/water separator. Sanitary wastewater is sent to an on-site septic system located south of the building. No other treatment is provided.

**Compliance**

Your compliance history for the time period of January 2010 thru June 2013 revealed the following numeric violations of your NPDES permit:

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
003	Oil and Grease, Total	1D Conc	10	12.8	1/14/2010
004	Oil and Grease, Total	1D Conc	10	12.1	9/16/2010
001	Oil and Grease, Hexane	1D Qty	0.0038	.01124	4/20/2011

**Storm Water Pollution Prevention Plan (SWPPP)**

Karman Rubber does not have a SWPPP. This is a violation of Part IV of the NPDES permit. The following is a USEPA web site that you may use to download a template for a SWPPP:

[http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008\\_swppp](http://cfpub.epa.gov/npdes/stormwater/msgp.cfm#msgp2008_swppp). Please submit a completed copy of your SWPPP to this office no later than September 30, 2013.

We also discussed whether or not your boiler water additives have been approved by Ohio EPA. Unless you can produce the approval, please use the enclosed boiler water and cooling additives questionnaire to begin this process. The completed form must be sent to the Ohio EPA, Division of Surface Water, Ohio EPA, P.O. Box 1049 Columbus, Ohio 43216-1049 no later than August 30, 2013.

If you should have any questions concerning any of the above, if not feel free to contact this writer at (330) 963-1136 or by e-mail at [phil.rhodes@epa.ohio.gov](mailto:phil.rhodes@epa.ohio.gov).

Sincerely,



Philip P. Rhodes, P. E.  
Environmental Engineer  
Division of Surface Water

PPR/cs

File/Industrial Permit/Compliance

Ohio EPA Policy	<b>PROCEDURE FOR SUBMITTING REQUESTS TO OBTAIN APPROVAL TO USE RECIRCULATING WATER, BOILER WATER AND NON-CONTACT COOLING WATER (NCCW) SYSTEM ADDITIVES</b>	
	DSW-0100.022  <b>Final</b>	Statutory references: ORC 6111.03, ORC 6111.041 Rule references: OAC 3745-1-36, OAC 3745-33-05, OAC 3745-33-07
		Ohio EPA, Division of Surface Water Revision 0, January 17, 1992 Revision 1, September 30, 1999 Revision 2, December 21, 2006 Revision 3, December 29, 2011
THIS POLICY DOES NOT HAVE THE FORCE OF LAW Pursuant to Section 3745.30 of the Revised Code, this policy was reviewed on the last revision date.		

### Purpose

The purpose of this policy is to define the process and data submission requirements a permittee may follow to obtain approval from Ohio EPA to use recirculating water, boiler water and non-contact cooling water system additives in lieu of maintaining a continuing monitoring program for the discharge of those additives.

### Background

Pursuant to Section 6111.03 of the Ohio Revised Code, Ohio EPA has the authority to regulate the discharge of pollutants to state surface waters through the National Pollutant Discharge Elimination System (NPDES) permit program. The Director of Ohio EPA has the authority to issue orders to require compliance with standards of water quality adopted under Section 6111.041 of the Ohio Revised Code. As specified by their NPDES permits, dischargers of once-through cooling water or, where on-site treatment is not available, the discharge of blowdown from either open or recirculating cooling or boiler water systems, are required to obtain written approval from Ohio EPA to use chemical additives that are discharged to waters of the state. They are required to demonstrate that the expected discharge concentration of the additive(s) to be used will meet Ohio Water Quality Standards. The permittee may follow this policy in lieu of having a continuing monitoring program for the additives in the discharge.

### Procedure

Ohio EPA has determined that following this procedure ensures that water quality standards (OAC 3745-1) will be met. Permittees who choose to follow this procedure to obtain written permission for the use of water system treatment additives, in lieu of maintaining a continuing monitoring program, must submit the following information to Ohio EPA.

1. **The name of the additive(s) to be used and general product information.** This information should include the:
  - a. Material Safety Data Sheet (MSDS) for each additive,
  - b. list of individual constituents or ingredients (active and inert),
  - c. chemical structure of each constituent,
  - d. specified use of the additive, and
  - e. the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)/U.S. EPA registration number (if applicable).

product as formulated) and, if available, for each active ingredient in order for the Agency to calculate instream acute and chronic toxicity values.

One **48-hour LC50** or **EC50** (if adverse effects other than lethality are evident) value determined by acute toxicity tests using a **Daphnid species** and at least one **96-hour LC50** or **EC50** value determined by acute toxicity tests using a **fish species** should be submitted. The following test durations and species are acceptable to Ohio EPA for conducting acute toxicity tests:

- 48-hour - *Daphnia magna***
- 48-hour - *Daphnia pulex***
- 48-hour - *Ceriodaphnia dubia***
- 96-hour - Rainbow Trout (*Oncorhynchus mykiss*)**
- 96-hour - Fathead Minnow (*Pimephales promelas*)**
- 96-hour - Bluegill Sunfish (*Lepomis macrochirus*)**

Other commonly used freshwater test species may also be used, such as scuds (*Hyallela azteca* - 48 hours), or mosquitofish (*Gambusia affinis* - 96 hours).

Chronic data for any of the test organisms specified above may be submitted in order to determine an acute/chronic ratio for the additive. If no chronic data are available, the procedures specified in rule 3745-1-36 of the Ohio Administrative Code (OAC) will be used to set a default value.

Toxicity tests shall be conducted using procedures contained in the Ohio EPA Reporting and Testing Guidance for Biomonitoring Required by the Ohio Environmental Protection Agency, July 1998 (or current revision). Copies may be obtained by contacting Ohio EPA at the address provided below. Ohio EPA procedures are in accordance with accepted U.S. EPA and ASTM protocols. Any requests to use a different methodology need to be approved by Ohio EPA prior to the initiation of testing.

Calculation procedures for the acute criterion and the chronic criterion are contained in OAC 3745-1-36. Depending on the toxicity data available, calculation procedures may vary. Less conservative calculation procedures are applied when acute toxicity data are available for species in at least eight families (as specified in OAC 3745-1-36) than when only the minimum toxicity data are available.

If data are available for both a fish and macroinvertebrate species, and is available for the appropriate endpoint (acute or chronic), the procedures associated with Ohio's narrative toxicity standard [OAC 3745-1-04(D)] may be used to set discharge criteria.

- b. The n-octanol/water partition coefficient (P) for each organic chemical and degradation/fate studies of the additive(s) should be submitted. This information will be used to evaluate the chemical's persistence in the environment and potential for it to bioaccumulate/bioconcentrate in aquatic organisms. Any other relevant information or studies that may aid in the evaluation of the additive may also be submitted.