

**Environmental
Protection Agency**

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

May 3, 2011

RE: RBB SYSTEMS
OHIO EPA PERMIT 3PR00444
RIPLEY TOWNSHIP, HOLMES COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Ross Lilley
RBB Systems
8767 Township Road 513
Shreve, OH 44676

Dear Mr. Lilley:

On April 27, 2011, a site inspection was conducted at the above referenced facility at 8767 Township Road 513, Ripley Township, Holmes County. The inspection was conducted by John Schmidt of this office. Nobody represented RBB Systems 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 facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on February 27, 2007.

The site consists of a former manufacturing building, now converted into a warehouse, and a vacant office building. Each building is served by a separate wastewater treatment system. The existing sewage treatment system which serves the former manufacturing building consists of a 500-gallon trash trap, 1,500 gallon extended aeration package plant with clarifier, dosing tank, and surface sand filter. The system which serves the office building consists of a home aeration system followed by a sand filter. Both systems discharge to a roadside ditch, then to an unnamed tributary of Shreve Creek east of the facility. No backup power is provided to the facility and the facility is provided with no alarms.

Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 1,500 gallons per day. The extended aeration plant operates continuously, with the sand filter operating on a float system in the dosing tank. The plant was not discharging at the time of the inspection.
2. Ohio EPA files reflect that production was moved from this facility to your Wooster operations in 2007, and the facility has been used as a warehouse and meeting space. It appears that during most of 2009, all of 2010, and so far in 2011, RBB Systems has reported no flow from this facility.

3. Ohio EPA records do not indicate an operator of record for this facility. From information provided to Ohio EPA, Dean's Backflow Service was apparently your former operator of record. Conversations with Mr. Dean indicate that he has not been your operator of record for some time.
4. Log books and the operation and maintenance manual unable to be located at the site and were not available for inspection.
5. The aeration blower was unable to be cycled. Operating condition is unknown.
6. The content of the aeration tank had a dark brown color with no aeration or mixing. Sludge returns were not operating due to a lack of air to the plant.
7. The surface of the clarifier was clear. The plant was unable to be turned on for purposes of the inspection. Effluent channels and weirs were clean. Due to a lack of air to the facility, the skimmer operating condition was unable to be verified.
8. The final discharge to the roadside ditch along Township Road 513 east of the plant was observed as not discharging.
9. Ohio EPA notes that sludge has not been removed from this facility since at least 2007. Sludge should be removed from the facility at least annually.
10. It is unknown who submits the data to Ohio EPA's electronic discharge monitoring report (e-DMR) system on behalf of RBB Systems through Ohio EPA's Web-based application.

NPDES Permit Compliance Review

RBB Systems operates the RBB Systems Shreve wastewater plant under Permit 3PR00444*AD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2007 through April 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	4.5	27.1	3/5/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Con	3.0	27.1	3/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	5.21	12/5/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	.23	6/2/2008
001	00610	Nitrogen, Ammonia (NH3)	1D Conc	1.5	6.37	6/13/2007
001	00610	Nitrogen, Ammonia (NH3)	30D Con	1.0	6.37	6/1/2007

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00300	Dissolved Oxygen	1D Conc	6.0	.27	6/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	1.97	3/3/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	5.1	8/4/2008
001	00300	Dissolved Oxygen	1D Conc	6.0	3.54	8/1/2007
001	00300	Dissolved Oxygen	1D Conc	6.0	2.21	3/2/2009

These effluent limit violations should be explained, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting code violations were noted for the reporting period reviewed; however the following reporting frequency violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00530	Total Suspended Solids	1/Quarter	1	0	07/01/2007
001	00610	Nitrogen, Ammonia	1/Quarter	1	0	07/01/2007
001	31616	Fecal Coliform	1/Quarter	1	0	07/01/2007
001	80082	CBOD 5 day	1/Quarter	1	0	07/01/2007
001	00400	pH	1/Quarter	1	0	07/01/2007
001	00300	Dissolved Oxygen	1/Quarter	1	0	07/01/2007

These reporting frequency violations should be explained, along with measures to ensure that they are not repeated.

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. Ohio EPA's eDMR support staff may also be available to assist you in this matter. Emailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Compliance Schedule Violations

The following compliance schedule violations were noted for the reporting period reviewed:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
1/1/2007	12/31/2011	5/1/2007	Not Completed	1799	Construction	Complete Plans & Specs
1/1/2007	12/31/2011	9/1/2007	Not Completed	3099	Construction	Begin Construction
1/1/2007	12/31/2011	1/1/2008	Not Completed	4599	Construction	End Construction

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Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
1/1/2007	12/31/2011	1/1/2008	Not Completed	5699	Construction	Compliance w/ Eff Limits

Ohio EPA understands that the reason why there has been recent compliance at this facility is that there is currently no flow from this facility. As you have elected to renew your NPDES permit, the referenced activities must be completed.

Other Violations: Operator of Record Designation - Pursuant to Part II, Item A of your NPDES permit, the wastewater treatment works must be under the supervision of a Class I State Certified Operator as required by OAC 3745-7-02. Part II, Item B requires you to designate an operator of record and notify Ohio EPA of the designated operator of record. Ohio EPA understands that RBB Systems may contract with Dean's Backflow Service or some other licensed operator as its operator of record. An examination of Ohio EPA's records indicates that no operator of record is designated for this facility. I have attached an operator of record form which must be completed and returned to Ohio EPA at the address listed on the form. As a courtesy, please provide a copy of this form in your response to this office.

NPDES Permit Status

On April 4, 2011, Ohio EPA received a renewal application for NPDES Permit No. 3PR00444. Ohio EPA has the permit under review, and notes the following:

1. Based upon a review of your application, Form A must be revised to reflect that you do not discharge process wastewater (Yes for Part II, Item E) and that the package wastewater treatment plant does generate a sludge that is hauled to another wastewater plant for further processing (Yes for Part II, Item G). You will also need to complete form 2S. You do not discharge storm water associated with industrial activity (No for Part II, Item F).
2. The permit renewal will also contain provisions to upgrade the package wastewater plant to include a disinfection system and to add a second blower to the aeration system.
3. The existing discharging system associated with the office building should be converted to an onsite system (i.e. leach bed or drip distribution) through the Holmes County Health Department.

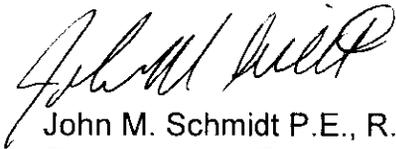
Based on the above information, RBB Systems is considered to be in substantial compliance with the terms and conditions of its NPDES permit for its RBB Systems Shreve facility; however the above items must be addressed. Based upon the inspection, another blower would be warranted at this location and will be included in a compliance schedule for your permit renewal.

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Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

- att: Operator of Record Notification Form, rev 02/2008
NPDES Form 2S, 1A, Transfer Form
- pc: Kraig Bucklew, Holmes County Health Department
Edwin Tinoco, Chem-Tech Consultants, Inc.
Kevin Dean, Dean's Backflow Service, w/encl
- File: Semipublic/Holmes/Ripley Twp/RBB Systems (3PR00444)