



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

May 24, 2013

RE: HOLMES COUNTY  
RIPLEY TOWNSHIP  
RBB SYSTEMS  
NPDES PERMIT NO. 3PR00444  
SFY 2013 CEI

RBB Systems  
4265-C East Lincoln Way  
Wooster, OH 44691  
Attn: Mr. Ross Lilley

Mr. Lilley:

On May 16, 2013, this writer met with you to inspect and discuss the wastewater treatment system for RBB Systems located at 8767 Twp. Road 513 in Ripley Township, Holmes County. The intent of the inspection was to evaluate the condition of the treatment system in preparation for easing or selling the facility. The manufacturing plant has been inoperable over the past two years.

The wastewater treatment plant (WWTP) is designed to treat a daily flow of 1,500 gallons. The system includes a trash trap, aeration tank with a single blower, clarifier, and a below grade sand filter. No disinfection system was available to disinfect the wastewater prior to discharge. Discharge from the system is to a small stream on the south side of the property.

No wastewater was flowing through the system at the time of the inspection. The single blower was started to ensure it is operational. The diffuser was not able to deliver air to the liquid in the aeration tank. You indicated that the diffuser will be removed and replaced. In the event the treatment system is used in the future, it is recommended that the owner install a second blower to provide a backup air source for the treatment system.

It was understood that the potential company that will assume the manufacturing building will have a maximum of 12 employees. At 25 gpd per employee, it is anticipated that approximately 300 gpd of wastewater will be discharged to the treatment system. It was also understood that only domestic wastewater will be discharged to the treatment system. No industrial waste will be discharged to the system.

Based on this information, this writer recommended that you investigate the installation of a tile field for wastewater disposal. Treated wastewater could be discharged to the tile field and eliminate the discharge to surface water. It was recommended that you contact the Holmes County Health Department to investigate the feasibility of installing a tile field.

In the event a discharge to surface waters is necessary, a disinfection system must be installed before this office can authorize the resumption of a discharge. Installation of a disinfection system was a requirement of the National Pollutant Discharge Elimination System (NPDES)

Permit No. 3PR00444\*BD, and it must be completed before any wastewater can be discharged to the treatment system. As discussed during the meeting, RBB Systems Inc. must receive a Permit-to-Install (PTI) from the director of Ohio EPA prior to installing the disinfection system. Information regarding the PTI process can be found at the following link:

<http://epa.ohio.gov/dsw/pti/index.aspx>

#### Compliance Review

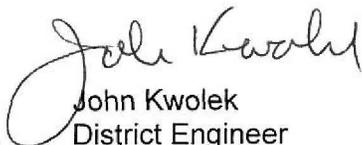
In order to establish the effectiveness of the treatment system, this writer reviewed the compliance record for the WWTP. The period of review was January 2005 through April 2013. Following are limit violations identified for the review period.

Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	Nitrogen, Ammonia	30D Conc	3.0	27.1	3/1/2007
March 2007	Nitrogen, Ammonia	1D Conc	4.5	27.1	3/5/2007
June 2007	Nitrogen, Ammonia	30D Conc	1.0	6.37	6/1/2007
June 2007	Dissolved Oxygen	1D Conc	6.0	.27	6/1/2007
June 2007	Nitrogen, Ammonia	1D Conc	1.5	6.37	6/13/2007
August 2007	Dissolved Oxygen	1D Conc	6.0	3.54	8/1/2007
December 2007	Dissolved Oxygen	1D Conc	6.0	5.21	12/5/2007
March 2008	Dissolved Oxygen	1D Conc	6.0	1.97	3/3/2008
June 2008	Dissolved Oxygen	1D Conc	6.0	.23	6/2/2008
August 2008	Dissolved Oxygen	1D Conc	6.0	5.1	8/4/2008
March 2009	Dissolved Oxygen	1D Conc	6.0	2.21	3/2/2009

It appears that the system has had compliance problems in the past with meeting the limits for ammonia and dissolved oxygen. If the system does continue to discharge to the small stream to the south of the facility, it may be necessary to upgrade the system in the event the system is unable to consistently comply with the NPDES Permit.

You may contact this writer at (330) 963-1251 or at [john.kwolek@epa.ohio.gov](mailto:john.kwolek@epa.ohio.gov) to discuss any questions you may have regarding this letter or regarding the requirements of the NPDES Permit.

Respectfully,



John Kwolek  
District Engineer  
Division of Surface Water

JK/cs

cc. John Croup, Holmes County Health Department