



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

September 10, 2013

RE: RYBER DEVELOPMENT, LLC
NPDES PERMIT NO. 3IE00011
ASHTABULA TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. Ryan Cochran, Vice President
Ryber Development, LLC
P.O. Box 1718
Ashtabula, OH 44055

Dear Mr. Cochran:

On September 9, 2012, a site inspection was conducted at the above referenced facility at 1800 East 21st Street, Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office, and you represented Ryber Development, LLC (Ryber). 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 inspection was conducted on September 6, 2012.

The site is known as the former RMI Titanium Metals Reduction Plant, and is currently used as a warehouse and offices for 12-15 people with one tenant conducting some processing which results in no discharges to the wastewater treatment system. Tenants include Union Industrial Contractors (UIC), Millennium Inorganic Chemicals, and Ultimate Chemical Solutions (UCS), a subsidiary of Reserve Environmental Services (RES). Liquid wastes tributary to the treatment facility are limited to sanitary wastewater and storm water runoff. Floor drains within buildings have been sealed. The design flow of the water treatment systems is 5,000 gpd, with an average daily flow under 1,000 gpd. Ryber has obtained a permit-to-install to convert the discharging sanitary system into an onsite sanitary wastewater treatment system, and envisions implementing the PTI in the fall of 2012 and completed those plant modifications on October 31, 2012. No discharge from Outfall 601 has been noted since October 31, 2012.

Observations

Following are observations and notations made during the inspection:

1. No changes to tenants have been noted since the last inspection. Ryber submitted and obtained a permit-to-install for converting the discharging sanitary treatment system into an onsite system. Therefore, the discharge at Outfall 601 ceased on October 25, 2012.
2. The current sanitary treatment system consists of utilizing an existing 11,000 gallon septic tank, existing pump station, followed by two 400 SF single pass sand filters in series constructed within the footprint of the old surface sand filter, dosing tank, and 600 LF of leaching field. The system was approved through PTI No. 871126 and approved in April 2012 and constructed in October 2012. The sanitary treatment system as modified is no longer a part of the NPDES system as of November 2012.

3. The treatment system is operated by Ryan Cochran. Mr. Cochran performs onsite dissolved oxygen (D.O.) and pH measurement at Outfall 001 and at Outfall 601 prior to November 2012. Samples for remaining parameters are collected by Mr. Cochran using sample collection bottles provided by the EA Group. EA Group provides all laboratory analysis. EA Group electronically submits the data to the electronic discharge monitoring report (eDMR) system.
4. Log books, the NPDES permit, and the operation and maintenance manual are maintained at the site in Mr. Cochran's office. The information was found compliant with OAC 3745-7-09. The plant is currently seen at least twice weekly by Mr. Cochran.
5. Ryber Development's tenants have approximately 12 to 15 people at this location. ***As requested following the 2011 and 2012 inspections, please provide an affidavit from Ultimate Chemical Solutions (UCS), a subsidiary of Reserve Environmental Services (RES) that no process wastewater is discharged, no materials are stored outside, and all materials are removed from the site.***
6. A walk-through of the former manufacturing area indicated that while there are no operating floor drains within the UCS area; however there are storm drains, which lie just outside the doors to the UCS process area.
7. The rotating sand bed has been converted into two single pass sand filters in parallel.
8. Outfall 001 was not discharging at the time of the inspection. Outfall 601 was verified as no longer discharging.
9. The October 2010 Storm Water Pollution Prevention Plan (SWPPP) was revised by Smolen Engineering, LTD on November 30, 2012. Training on the plan was completed on February 6, 2013. The annual site certification and inspection were also completed on January 4, 2013. The plan has been revised to reflect activities by tenants that could result in a spill or release to the storm sewer system.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period August 1, 2012 through August 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit as follows:

Effluent Violations

No effluent violations were noted for the time period reviewed.

Reporting Violations

No reporting code or reporting frequency violations were noted for the time period reviewed.

Compliance Schedule

Your NPDES permit contains the following compliance schedule:

Permit Effective Date	Permit Expiration Date	Schedule Date	Due Completion Date	Event Code	Schedule Type	Schedule Milestone
09/01/2011	08/31/2016	06/01/2012	02/03/2012	95999	Report	Evaluate E Coli limits
09/01/2011	08/31/2016	06/01/2012	03/29/2012	-----	Report	Submit PTI if needed
09/01/2011	08/31/2016	09/01/2012	11/01/2012	05699	Construction	Comply with E Coli Limits

Ryber has stated that the current system is unable to meet the new bacteria standards, and

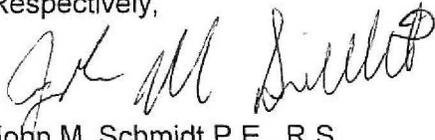
submitted a PTI application to convert the existing discharging system into an onsite system. Ryber completed plant modifications in October 2012. While the milestone was completed late, it was completed. No additional information is required to respond to the compliance schedule violation.

Comment

With the sanitary treatment system converted to an onsite system and floor drains eliminated from the former manufacturing facility, the current NPDES permit only pertains to storm water activities at this site. We discussed having Ryber Development apply for coverage under the general industrial storm water permit and after coverage is obtained terminating this individual NPDES permit. Information on the general storm water permit may be found at http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx. If you choose to obtain coverage under the general permit, please provide this office with a courtesy copy of the Notice of Intent (NOI) form and any final issued coverage. At that time, Ohio EPA can process a revocation of NPDES Permit No. 3IE00011.

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

Respectively,

A handwritten signature in black ink, appearing to read "John M. Schmidt". The signature is written in a cursive style with a large initial "J" and "M".

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

JMS/cs

File/Industrial/Ryber Development, LLC/PC

