



State of Ohio Environmental Protection Agency

Northeast District Office

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August 12, 2009

RE: ALPINE CHEESE
U.S. ROUTE 62
NPDES PERMIT NO 3IH00100

Mr. Bob Ramseyer
Holmes Cheese Company
9444 State Route 39
Millersburg, OH 44654

Dear Mr. Ramseyer:

On July 9, 2009, this writer conducted an unannounced Compliance Evaluation Inspection (CEI) of the Alpine Cheese wastewater treatment system. The intent of the inspection was to evaluate the operations and maintenance of the wastewater treatment system. In addition, the monitoring record for Alpine Cheese was evaluated from the time of the last Compliance Evaluation Inspection to the present. Representing the company during the inspection were Brian Barbey and Rick Spangler. Following are a list of observations.

Treatment Plant Observations

No wastewater was passing through the treatment system at the time of the inspection. The volume of the wastewater through the system prior to the inspection was approximately 28,000 gallons. Mr. Spangler stated that the flow rate was low because of a reduction in cheese production resulting from routine maintenance within the production area.

The condition of the treatment plant was unsatisfactory at the time of the inspection for the following reasons.

- The color and mixing in the vertical loop reactor was good at the time of the inspection. However, the sludge in the digesters for the VLR system appeared to be approaching septic. There were black areas of the tank indicating that sufficient air was not being provided to the tank. Mr. Spangler indicated that the diffusers in the aeration tank were to be replaced because of periodic malfunctions.
- The level of water in the clarifier was below the weir. No discharge from the clarifier was occurring. However, the weir and effluent trough had significant algal growth. The weirs should be cleaned more frequently and possibly on a daily basis because of the high level of nutrients in the wastewater. Black clumps of sludge were floating on the clarifier and were also apparent in the effluent trough indicating the sludge periodically bypasses the clarifier. The discharge of sludge from the clarifier places an unnecessary solids load on the phosphorus removal system. This solids load to the phosphorous treatment system can reduce the effectiveness of the system and prevent compliance with the NPDES Permit.

The black sludge in the clarifier may indicate that the clarifier had not been recently drained and cleaned. The black clumps of sludge floating in the clarifier results from the

denitrification of old sludge residues attached to surfaces of the clarifier. The denitrification causes nitrogen bubbles to form in the sludge which then causes clumps of sludge to float to the surface of the clarifier. The clumps of sludge then discharge over the weir as evidenced by the sludge residue in the weir trough. This is typical of clarifiers that are not properly cleaned or maintained on a routine basis.

Floating clumps of sludge on the surface of the clarifier were identified in previous inspection reports to Alpine Cheese. In previous inspection reports, this writer also provided suggestions for proper maintenance of the clarifier. It is again recommended that the tank be taken out of service for cleaning. At times of low flow, such as was the situation during this inspection, the clarifier should be drained and the sludge and debris should be hosed from all surfaces. The weirs should also be thoroughly cleaned of all debris. The sludge and debris must be returned to the head of the plant for re-treatment.

As stated in the last inspection report, periodic cleaning of old sludge from the tank will prevent sludge solids from floating to the surface and overflowing the weir. Periodically draining and cleaning the clarifier is considered routine for any biological wastewater treatment plant like that at Alpine Cheese.

- The SAF system used to remove phosphorus from the wastewater was not discharging at the time of the inspection due to low flow conditions. However, there was a significant amount of dried sludge on the floor of the phosphorus treatment building. Mr. Spangler indicated that the sludge holding tank had overflowed onto the floor. Though the dried sludge had been partially swept from the floor, an obvious residue of dried sludge remained under and around equipment.
- The trough leading into the ultraviolet (UV) system had heavy residue attached to the sides indicating that it had not been recently cleaned. Since a maintenance log is not used by Alpine Cheese, it is not possible to determine how often the UV system is cleaned or whether the system is properly maintained. However, based on the appearance during the inspection, it is probable that the system receives insufficient attention.
- The floor of the UV building was covered with a white residue. The residue was polymer liquid. The polymer had covered a significant area of the floor and was observed outside of the building.

Compliance Review

As part of this inspection, this writer reviewed the compliance record for Alpine Cheese. The period of review was October 2007 through June 2009. The NPDES Permit violations identified over the review period are listed below.

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2007	002	CBOD 5 day	1D Qty	7.9609	8.01209	10/2/2007

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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2007	002	Phosphorus, Total (P)	1D Qty	2.5	2.57531	10/2/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	2730.	10/2/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3750.	10/4/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	4380.	10/9/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3500.	10/11/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	4020.	10/16/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3700.	10/18/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	2960.	10/25/2007
October 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3460.	10/30/2007
October 2007	002	Residue, Total Dissolv	30D Conc	1785	3426.66	10/1/2007
October 2007	002	Residue, Total Dissolv	30D Qty	812.01	1907.96	10/1/2007
October 2007	002	Total Suspended Solids	1D Conc	18.0	20.	10/2/2007
October 2007	002	Total Suspended Solids	1D Conc	18.0	30.	10/4/2007
October 2007	002	Total Suspended Solids	1D Conc	18.0	40.	10/16/2007
October 2007	002	Total Suspended Solids	1D Conc	18.0	40.	10/23/2007
October 2007	002	Total Suspended Solids	30D Conc	12.0	21.	10/1/2007
October 2007	002	Total Suspended Solids	1D Qty	9.55	11.4458	10/2/2007
October 2007	002	Total Suspended Solids	1D Qty	9.55	14.8523	10/4/2007
October 2007	002	Total Suspended Solids	1D Qty	9.55	24.2694	10/16/2007
October 2007	002	Total Suspended Solids	1D Qty	9.55	22.7705	10/23/2007
October 2007	002	Total Suspended Solids	30D Qty	6.37	11.7514	10/1/2007
October 2007	601	Total Suspended Solids	1D Conc	18	26.	10/2/2007
October 2007	601	Total Suspended Solids	1D Conc	18	23.	10/9/2007
October 2007	601	Total Suspended Solids	1D Conc	18	50.	10/16/2007
October 2007	601	Total Suspended Solids	1D Conc	18	50.	10/23/2007
October 2007	601	Total Suspended Solids	30D Conc	12	31.2	10/1/2007
October 2007	601	Total Suspended Solids	1D Qty	5.4589	7.31186	10/2/2007
October 2007	601	Total Suspended Solids	1D Qty	5.4589	6.72935	10/9/2007
October 2007	601	Total Suspended Solids	1D Qty	5.4589	14.3451	10/16/2007
October 2007	601	Total Suspended Solids	1D Qty	5.4589	12.7933	10/23/2007
October 2007	601	Total Suspended Solids	30D Qty	3.6392	8.61587	10/1/2007
November 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3300.	11/1/2007
November 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3120.	11/13/2007
November 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3120.	11/15/2007
November 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3300.	11/20/2007
November 2007	002	Residue, Total Dissolv	1D Conc	2677.5	2980.	11/29/2007
November 2007	002	Residue, Total Dissolv	30D Conc	1785	2663.25	11/1/2007
November 2007	002	Residue, Total Dissolv	30D Qty	812.01	1301.04	11/1/2007
November 2007	601	Total Suspended Solids	1D Conc	18	143.	11/6/2007
November 2007	601	Total Suspended Solids	1D Conc	18	20.	11/13/2007
November 2007	601	Total Suspended Solids	1D Conc	18	35.	11/20/2007
November 2007	601	Total Suspended Solids	30D Conc	12	50.75	11/1/2007

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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
November 2007	601	Total Suspended Solids	1D Qty	5.4589	27.0627	11/6/2007
November 2007	601	Total Suspended Solids	30D Qty	3.6392	9.65175	11/1/2007
December 2007	002	Residue, Total Dissolv	1D Conc	2677.5	3970.	12/4/2007
December 2007	002	Residue, Total Dissolv	1D Conc	2677.5	2750.	12/13/2007
December 2007	002	Residue, Total Dissolv	1D Conc	2677.5	2890.	12/20/2007
December 2007	002	Residue, Total Dissolv	30D Conc	1785	2694.28	12/1/2007
December 2007	002	Residue, Total Dissolv	30D Qty	812.01	1448.30	12/1/2007
December 2007	002	Total Suspended Solids	1D Conc	18.0	20.	12/13/2007
December 2007	002	Total Suspended Solids	1D Conc	18.0	20.	12/18/2007
December 2007	002	Total Suspended Solids	1D Conc	18.0	20.	12/20/2007
December 2007	002	Total Suspended Solids	1D Conc	18.0	20.	12/27/2007
December 2007	002	Total Suspended Solids	30D Conc	12.0	13.5714	12/1/2007
December 2007	002	Total Suspended Solids	1D Qty	9.55	11.355	12/13/2007
December 2007	002	Total Suspended Solids	1D Qty	9.55	11.355	12/18/2007
December 2007	002	Total Suspended Solids	1D Qty	9.55	11.355	12/20/2007
December 2007	002	Total Suspended Solids	1D Qty	9.55	12.112	12/27/2007
December 2007	002	Total Suspended Solids	30D Qty	6.37	7.75925	12/1/2007
December 2007	601	Phosphorus, Total (P)	1D Conc	8.4	8.74	12/18/2007
December 2007	601	Total Suspended Solids	1D Conc	18	20.	12/11/2007
December 2007	601	Total Suspended Solids	1D Conc	18	75.	12/18/2007
December 2007	601	Total Suspended Solids	1D Conc	18	20.	12/27/2007
December 2007	601	Total Suspended Solids	30D Conc	12	30.	12/1/2007
December 2007	601	Total Suspended Solids	1D Qty	5.4589	19.8712	12/18/2007
December 2007	601	Total Suspended Solids	30D Qty	3.6392	7.66463	12/1/2007
January 2008	002	Phosphorus, Total (P)	1D Conc	4.8	8.31	1/29/2008
January 2008	002	Phosphorus, Total (P)	1D Conc	4.8	8.31	1/29/2008
January 2008	002	Phosphorus, Total (P)	1D Qty	2.5	5.03254	1/29/2008
January 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2800.	1/3/2008
January 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2900.	1/8/2008
January 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2910.	1/10/2008
January 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2750.	1/15/2008
January 2008	002	Residue, Total Dissolv	30D Conc	1785	2572.22	1/1/2008
January 2008	002	Residue, Total Dissolv	30D Qty	812.01	1417.31	1/1/2008
January 2008	002	Total Suspended Solids	1D Conc	18.0	60.	1/8/2008
January 2008	002	Total Suspended Solids	1D Conc	18.0	30.	1/10/2008
January 2008	002	Total Suspended Solids	1D Conc	18.0	30.	1/15/2008
January 2008	002	Total Suspended Solids	30D Conc	12.0	16.7777	1/1/2008
January 2008	002	Total Suspended Solids	1D Qty	9.55	34.065	1/8/2008
January 2008	002	Total Suspended Solids	1D Qty	9.55	18.168	1/10/2008
January 2008	002	Total Suspended Solids	1D Qty	9.55	15.897	1/15/2008
January 2008	002	Total Suspended Solids	30D Qty	6.37	9.39942	1/1/2008
January 2008	601	Phosphorus, Total (P)	1D Conc	8.4	9.35	1/29/2008

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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2008	601	Total Suspended Solids	1D Conc	18	40.	1/3/2008
January 2008	601	Total Suspended Solids	1D Conc	18	30.	1/8/2008
January 2008	601	Total Suspended Solids	1D Conc	18	95.	1/22/2008
January 2008	601	Total Suspended Solids	30D Conc	12	36.4	1/1/2008
January 2008	601	Total Suspended Solids	1D Qty	5.4589	7.57	1/3/2008
January 2008	601	Total Suspended Solids	1D Qty	5.4589	7.9485	1/8/2008
January 2008	601	Total Suspended Solids	1D Qty	5.4589	25.1702	1/22/2008
January 2008	601	Total Suspended Solids	30D Qty	3.6392	8.7812	1/1/2008
February 2008	002	Phosphorus, Total (P)	1D Conc	4.8	5.44	2/12/2008
February 2008	002	Phosphorus, Total (P)	1D Conc	4.8	5.44	2/12/2008
February 2008	002	Phosphorus, Total (P)	1D Qty	2.5	2.88266	2/12/2008
February 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3530.	2/5/2008
February 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2980.	2/7/2008
February 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3570.	2/12/2008
February 2008	002	Residue, Total Dissolv	30D Conc	1785	2777.5	2/1/2008
February 2008	002	Residue, Total Dissolv	30D Qty	812.01	1440.23	2/1/2008
February 2008	002	Total Suspended Solids	1D Conc	18.0	22.	2/28/2008
March 2008	002	Phosphorus, Total (P)	1D Conc	4.8	13.5	3/27/2008
March 2008	002	Phosphorus, Total (P)	1D Conc	4.8	13.5	3/27/2008
March 2008	002	Phosphorus, Total (P)	30D Conc	3.2	3.41	3/1/2008
March 2008	002	Phosphorus, Total (P)	1D Qty	2.5	6.1317	3/27/2008
March 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3020.	3/6/2008
March 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3210.	3/20/2008
March 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2780.	3/25/2008
March 2008	002	Residue, Total Dissolv	30D Conc	1785	2177.5	3/1/2008
March 2008	002	Residue, Total Dissolv	30D Qty	812.01	1134.03	3/1/2008
March 2008	002	Total Suspended Solids	1D Conc	18.0	25.	3/6/2008
March 2008	002	Total Suspended Solids	1D Conc	18.0	40.	3/13/2008
March 2008	002	Total Suspended Solids	30D Conc	12.0	13.625	3/1/2008
March 2008	002	Total Suspended Solids	1D Qty	9.55	13.2475	3/6/2008
March 2008	002	Total Suspended Solids	1D Qty	9.55	19.682	3/13/2008
March 2008	002	Total Suspended Solids	30D Qty	6.37	6.9644	3/1/2008
March 2008	601	Total Suspended Solids	1D Conc	18	25.	3/4/2008
March 2008	601	Total Suspended Solids	1D Qty	5.4589	6.62375	3/4/2008
April 2008	002	Dissolved Oxygen	1D Conc	6.0	5.6	4/1/2008
April 2008	002	pH	1D Conc	6.5	5.8	4/10/2008
April 2008	002	Phosphorus, Total (P)	1D Conc	4.8	11.2	4/1/2008
April 2008	002	Phosphorus, Total (P)	1D Conc	4.8	8.91	4/3/2008
April 2008	002	Phosphorus, Total (P)	1D Conc	4.8	11.2	4/1/2008
April 2008	002	Phosphorus, Total (P)	1D Conc	4.8	8.91	4/3/2008
April 2008	002	Phosphorus, Total (P)	30D Conc	3.2	3.93467	4/1/2008
April 2008	002	Phosphorus, Total (P)	1D Qty	2.5	5.08704	4/1/2008

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April 2008	002	Phosphorus, Total (P)	1D Qty	2.5	4.38417	4/3/2008
April 2008	002	Phosphorus, Total (P)	30D Qty	1.7	1.95404	4/1/2008
April 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2930.	4/17/2008
April 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3480.	4/22/2008
April 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3160.	4/24/2008
April 2008	002	Residue, Total Dissolv	30D Conc	1785	2265.55	4/1/2008
April 2008	002	Residue, Total Dissolv	30D Qty	812.01	1172.17	4/1/2008
April 2008	601	Phosphorus, Total (P)	1D Conc	8.4	11.2	4/1/2008
May 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.98	5/20/2008
May 2008	002	Nitrogen, Ammonia	1D Conc	1.5	3.14	5/22/2008
May 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.7	5/29/2008
May 2008	002	Nitrogen, Ammonia	30D Conc	1.0	1.32756	5/1/2008
May 2008	002	Nitrogen, Ammonia	1D Qty	0.79	.97426	5/20/2008
May 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.90158	5/22/2008
May 2008	002	Nitrogen, Ammonia	30D Qty	0.53	.69729	5/1/2008
May 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3060.	5/1/2008
May 2008	002	Residue, Total Dissolv	30D Conc	1785	2134.44	5/1/2008
May 2008	002	Residue, Total Dissolv	30D Qty	812.01	1095.21	5/1/2008
May 2008	002	Total Suspended Solids	1D Conc	18.0	25.	5/20/2008
May 2008	002	Total Suspended Solids	1D Qty	9.55	12.3012	5/20/2008
May 2008	002	Total Suspended Solids	1D Qty	9.55	10.9008	5/22/2008
May 2008	601	Total Suspended Solids	1D Conc	18	35.	5/6/2008
May 2008	601	Total Suspended Solids	30D Conc	12	15.	5/1/2008
May 2008	601	Total Suspended Solids	1D Qty	5.4589	9.27325	5/6/2008
May 2008	601	Total Suspended Solids	30D Qty	3.6392	3.785	5/1/2008
June 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.54	6/5/2008
June 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.85	6/10/2008
June 2008	002	Nitrogen, Ammonia	1D Conc	1.5	3.53	6/17/2008
June 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.94	6/19/2008
June 2008	002	Nitrogen, Ammonia	1D Conc	1.5	3.79	6/24/2008
June 2008	002	Nitrogen, Ammonia	1D Conc	1.5	3.06	6/26/2008
June 2008	002	Nitrogen, Ammonia	30D Conc	1.0	2.26	6/1/2008
June 2008	002	Nitrogen, Ammonia	1D Qty	0.79	.87434	6/5/2008
June 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.05034	6/10/2008
June 2008	002	Nitrogen, Ammonia	1D Qty	0.79	2.13777	6/17/2008
June 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.10144	6/19/2008
June 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.86487	6/24/2008
June 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.62149	6/26/2008
June 2008	002	Nitrogen, Ammonia	30D Qty	0.53	1.2543	6/1/2008
June 2008	002	Phosphorus, Total (P)	1D Conc	4.8	4.98	6/17/2008
June 2008	002	Phosphorus, Total (P)	1D Conc	4.8	12.7	6/19/2008
June 2008	002	Phosphorus, Total (P)	1D Conc	4.8	4.98	6/17/2008

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June 2008	002	Phosphorus, Total (P)	1D Conc	4.8	12.7	6/19/2008
June 2008	002	Phosphorus, Total (P)	30D Conc	3.2	3.75	6/1/2008
June 2008	002	Phosphorus, Total (P)	1D Qty	2.5	3.01589	6/17/2008
June 2008	002	Phosphorus, Total (P)	1D Qty	2.5	7.21043	6/19/2008
June 2008	002	Phosphorus, Total (P)	30D Qty	1.7	2.11137	6/1/2008
June 2008	002	Residue, Total Dissolv	30D Qty	812.01	995.530	6/1/2008
June 2008	601	Nitrogen, Ammonia	1D Conc	1.5	1.53	6/10/2008
June 2008	601	Nitrogen, Ammonia	1D Conc	1.5	4.01	6/17/2008
June 2008	601	Nitrogen, Ammonia	1D Conc	1.5	4.43	6/24/2008
June 2008	601	Nitrogen, Ammonia	30D Conc	1.0	2.665	6/1/2008
June 2008	601	Nitrogen, Ammonia	1D Qty	0.4549	.46328	6/10/2008
June 2008	601	Nitrogen, Ammonia	1D Qty	0.4549	1.06245	6/17/2008
June 2008	601	Nitrogen, Ammonia	1D Qty	0.4549	.83838	6/24/2008
June 2008	601	Nitrogen, Ammonia	30D Qty	0.3032	.64326	6/1/2008
June 2008	601	Total Suspended Solids	1D Conc	18	25.	6/17/2008
June 2008	601	Total Suspended Solids	30D Conc	12	13.	6/1/2008
June 2008	601	Total Suspended Solids	1D Qty	5.4589	6.62375	6/17/2008
July 2008	002	Nitrogen, Ammonia	1D Conc	1.5	3.08	7/1/2008
July 2008	002	Nitrogen, Ammonia	1D Conc	1.5	2.04	7/3/2008
July 2008	002	Nitrogen, Ammonia	1D Conc	1.5	2.34	7/8/2008
July 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.76	7/17/2008
July 2008	002	Nitrogen, Ammonia	30D Conc	1.0	1.63211	7/1/2008
July 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.63209	7/1/2008
July 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.15821	7/3/2008
July 2008	002	Nitrogen, Ammonia	1D Qty	0.79	.79712	7/8/2008
July 2008	002	Nitrogen, Ammonia	1D Qty	0.79	.93262	7/17/2008
July 2008	002	Nitrogen, Ammonia	30D Qty	0.53	.81082	7/1/2008
July 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2700.	7/8/2008
July 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2920.	7/17/2008
July 2008	002	Residue, Total Dissolv	1D Conc	2677.5	3080.	7/22/2008
July 2008	002	Residue, Total Dissolv	30D Conc	1785	2399.55	7/1/2008
July 2008	002	Residue, Total Dissolv	30D Qty	812.01	1195.75	7/1/2008
July 2008	002	Total Suspended Solids	1D Conc	18.0	45.	7/1/2008
July 2008	002	Total Suspended Solids	1D Conc	18.0	30.	7/8/2008
July 2008	002	Total Suspended Solids	1D Conc	18.0	30.	7/15/2008
July 2008	002	Total Suspended Solids	30D Conc	12.0	14.8888	7/1/2008
July 2008	002	Total Suspended Solids	1D Qty	9.55	23.8455	7/1/2008
July 2008	002	Total Suspended Solids	1D Qty	9.55	10.2195	7/8/2008
July 2008	002	Total Suspended Solids	1D Qty	9.55	14.7615	7/15/2008
July 2008	002	Total Suspended Solids	30D Qty	6.37	7.15786	7/1/2008
July 2008	601	Nitrogen, Ammonia	1D Conc	1.5	3.01	7/1/2008
July 2008	601	Nitrogen, Ammonia	30D Conc	1.0	1.2042	7/1/2008

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2008	601	Nitrogen, Ammonia	1D Qty	0.4549	.68357	7/1/2008
July 2008	601	Total Suspended Solids	1D Conc	18	45.	7/1/2008
July 2008	601	Total Suspended Solids	1D Conc	18	20.	7/8/2008
July 2008	601	Total Suspended Solids	1D Conc	18	65.	7/15/2008
July 2008	601	Total Suspended Solids	1D Conc	18	75.	7/31/2008
July 2008	601	Total Suspended Solids	30D Conc	12	41.	7/1/2008
July 2008	601	Total Suspended Solids	1D Qty	5.4589	10.2195	7/1/2008
July 2008	601	Total Suspended Solids	1D Qty	5.4589	17.2217	7/15/2008
July 2008	601	Total Suspended Solids	1D Qty	5.4589	17.0325	7/31/2008
July 2008	601	Total Suspended Solids	30D Qty	3.6392	9.95455	7/1/2008
August 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2810.	8/5/2008
August 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2830.	8/26/2008
August 2008	002	Residue, Total Dissolv	30D Conc	1785	2210.25	8/1/2008
August 2008	002	Residue, Total Dissolv	30D Qty	812.01	1177.45	8/1/2008
August 2008	002	Total Suspended Solids	1D Conc	18.0	20.	8/5/2008
August 2008	002	Total Suspended Solids	1D Qty	9.55	11.355	8/5/2008
August 2008	601	Total Suspended Solids	1D Conc	18	40.	8/26/2008
August 2008	601	Total Suspended Solids	1D Qty	5.4589	10.598	8/26/2008
Sept. 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.83	9/9/2008
Sept. 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.59	9/16/2008
Sept. 2008	002	Nitrogen, Ammonia	1D Conc	1.5	3.17	9/30/2008
Sept. 2008	002	Nitrogen, Ammonia	30D Conc	1.0	1.38489	9/1/2008
Sept. 2008	002	Nitrogen, Ammonia	1D Qty	0.79	1.43981	9/30/2008
Sept. 2008	002	Nitrogen, Ammonia	30D Qty	0.53	.63617	9/1/2008
Sept. 2008	002	Residue, Total Dissolv	1D Conc	2677.5	4320.	9/23/2008
Sept. 2008	002	Residue, Total Dissolv	1D Conc	2677.5	4070.	9/25/2008
Sept. 2008	002	Residue, Total Dissolv	30D Conc	1785	2703.33	9/1/2008
Sept. 2008	002	Residue, Total Dissolv	30D Qty	812.01	1331.43	9/1/2008
Sept. 2008	601	Total Suspended Solids	1D Conc	18	40.	9/2/2008
Sept. 2008	601	Total Suspended Solids	30D Conc	12	16.8	9/1/2008
Sept. 2008	601	Total Suspended Solids	1D Qty	5.4589	12.112	9/2/2008
Sept. 2008	601	Total Suspended Solids	30D Qty	3.6392	4.67069	9/1/2008
October 2008	002	CBOD 5 day	1D Conc	15.0	16.	10/28/2008
October 2008	002	CBOD 5 day	1D Qty	7.9609	8.4784	10/28/2008
October 2008	002	Dissolved Oxygen	1D Conc	6.0	5.06	10/9/2008
October 2008	002	Dissolved Oxygen	1D Conc	6.0	5.54	10/10/2008
October 2008	002	Dissolved Oxygen	1D Conc	6.0	5.8	10/14/2008
October 2008	002	Nitrogen, Ammonia	1D Conc	1.5	1.52	10/28/2008
October 2008	002	Nitrogen, Ammonia	1D Conc	1.5	3.35	10/30/2008
October 2008	002	Nitrogen, Ammonia	1D Qty	0.79	.80545	10/28/2008
October 2008	002	Nitrogen, Ammonia	1D Qty	0.79	2.02876	10/30/2008
October 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2800.	10/14/2008

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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
October 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2790.	10/16/2008
October 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2780.	10/21/2008
October 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2960.	10/23/2008
October 2008	002	Residue, Total Dissolv	30D Conc	1785	2088.33	10/1/2008
October 2008	002	Residue, Total Dissolv	30D Qty	812.01	1222.47	10/1/2008
October 2008	002	Total Suspended Solids	1D Conc	18.0	28.	10/28/2008
October 2008	002	Total Suspended Solids	1D Qty	9.55	14.8372	10/28/2008
October 2008	601	CBOD 5 day	1D Conc	15	24.	10/28/2008
October 2008	601	CBOD 5 day	1D Qty	4.5490	5.4504	10/28/2008
October 2008	601	Nitrogen, Ammonia	1D Conc	1.5	1.93	10/28/2008
October 2008	601	Total Suspended Solids	1D Conc	18	24.	10/28/2008
November 2008	002	Residue, Total Dissolv	30D Conc	1785	1904.28	11/1/2008
November 2008	002	Residue, Total Dissolv	30D Qty	812.01	1037.19	11/1/2008
November 2008	002	Total Suspended Solids	1D Conc	18.0	20.	11/25/2008
November 2008	002	Total Suspended Solids	1D Qty	9.55	10.598	11/25/2008
November 2008	601	Total Suspended Solids	1D Conc	18	24.	11/18/2008
November 2008	601	Total Suspended Solids	1D Conc	18	26.	11/25/2008
November 2008	601	Total Suspended Solids	30D Conc	12	13.	11/1/2008
November 2008	601	Total Suspended Solids	1D Qty	5.4589	6.3588	11/18/2008
November 2008	601	Total Suspended Solids	1D Qty	5.4589	6.8887	11/25/2008
December 2008	002	Residue, Total Dissolv	1D Conc	2677.5	2830.	12/2/2008
December 2008	002	Residue, Total Dissolv	30D Qty	812.01	894.080	12/1/2008
December 2008	002	Total Suspended Solids	1D Conc	18.0	24.	12/9/2008
December 2008	002	Total Suspended Solids	1D Conc	18.0	28.	12/11/2008
December 2008	002	Total Suspended Solids	1D Conc	18.0	20.	12/23/2008
December 2008	002	Total Suspended Solids	1D Qty	9.55	14.5344	12/9/2008
December 2008	002	Total Suspended Solids	1D Qty	9.55	14.8372	12/11/2008
December 2008	601	Total Suspended Solids	1D Conc	18	24.	12/9/2008
December 2008	601	Total Suspended Solids	1D Conc	18	32.	12/23/2008
December 2008	601	Total Suspended Solids	30D Conc	12	16.5	12/1/2008
December 2008	601	Total Suspended Solids	1D Qty	5.4589	7.2672	12/9/2008
December 2008	601	Total Suspended Solids	1D Qty	5.4589	8.4784	12/23/2008
December 2008	601	Total Suspended Solids	30D Qty	3.6392	4.6934	12/1/2008
February 2009	002	CBOD 5 day	1D Conc	15.0	26.	2/10/2009
February 2009	002	CBOD 5 day	1D Qty	7.9609	12.7933	2/10/2009
February 2009	002	Total Suspended Solids	1D Conc	18.0	20.	2/10/2009
February 2009	002	Total Suspended Solids	1D Qty	9.55	9.841	2/10/2009
February 2009	601	CBOD 5 day	1D Conc	15	16.	2/10/2009
March 2009	002	Nitrogen, Ammonia	1D Conc	4.5	5.99	3/3/2009
March 2009	002	Nitrogen, Ammonia	1D Conc	4.5	5.35	3/5/2009
March 2009	002	Nitrogen, Ammonia	1D Conc	4.5	4.53	3/12/2009
March 2009	002	Nitrogen, Ammonia	30D Conc	3.0	3.08656	3/1/2009

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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2009	002	Nitrogen, Ammonia	1D Qty	2.39	2.49394	3/3/2009
March 2009	002	Nitrogen, Ammonia	1D Qty	2.39	2.42997	3/5/2009
March 2009	002	Phosphorus, Total (P)	1D Qty	2.5	2.53292	3/26/2009
March 2009	601	Nitrogen, Ammonia	1D Conc	4.5	6.29	3/3/2009
March 2009	601	Total Suspended Solids	1D Conc	18	22.5	3/31/2009
March 2009	601	Total Suspended Solids	1D Qty	5.4589	5.96138	3/31/2009
April 2009	601	Total Suspended Solids	1D Conc	18	20.	4/7/2009
April 2009	601	Total Suspended Solids	1D Conc	18	30.	4/14/2009
April 2009	601	Total Suspended Solids	30D Conc	12	17.5	4/1/2009
April 2009	601	Total Suspended Solids	1D Qty	5.4589	7.9485	4/14/2009
April 2009	601	Total Suspended Solids	30D Qty	3.6392	4.44738	4/1/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	2.15	5/5/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	4.56	5/7/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	3.08	5/12/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	6.39	5/14/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	2.18	5/19/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	4.03	5/21/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	2.02	5/26/2009
May 2009	002	Nitrogen, Ammonia	1D Conc	1.5	2.61	5/28/2009
May 2009	002	Nitrogen, Ammonia	30D Conc	1.0	3.3775	5/1/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	1.22066	5/5/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	2.76154	5/7/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	1.86525	5/12/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	3.62792	5/14/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	1.2377	5/19/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	2.1355	5/21/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	1.14686	5/26/2009
May 2009	002	Nitrogen, Ammonia	1D Qty	0.79	1.48183	5/28/2009
May 2009	002	Nitrogen, Ammonia	30D Qty	0.53	1.93466	5/1/2009
May 2009	002	Residue, Total Dissolv	30D Qty	812.01	819.045	5/1/2009
May 2009	601	Nitrogen, Ammonia	1D Conc	1.5	2.23	5/5/2009
May 2009	601	Nitrogen, Ammonia	1D Conc	1.5	4.62	5/12/2009
May 2009	601	Nitrogen, Ammonia	1D Conc	1.5	2.36	5/19/2009
May 2009	601	Nitrogen, Ammonia	1D Conc	1.5	1.76	5/26/2009
May 2009	601	Nitrogen, Ammonia	30D Conc	1.0	2.7425	5/1/2009
May 2009	601	Nitrogen, Ammonia	1D Qty	0.4549	.59084	5/5/2009
May 2009	601	Nitrogen, Ammonia	1D Qty	0.4549	1.22407	5/12/2009
May 2009	601	Nitrogen, Ammonia	1D Qty	0.4549	.62528	5/19/2009
May 2009	601	Nitrogen, Ammonia	1D Qty	0.4549	.59954	5/26/2009
May 2009	601	Nitrogen, Ammonia	30D Qty	0.3032	.75993	5/1/2009
June 2009	002	Nitrogen, Ammonia	1D Conc	1.5	1.57	6/2/2009
June 2009	002	Nitrogen, Ammonia	1D Conc	1.5	1.69	6/23/2009

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Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
June 2009	002	Nitrogen, Ammonia	1D Qty	0.79	.83194	6/2/2009
June 2009	002	Residue, Total Dissolv	1D Conc	2677.5	2820.	6/23/2009
June 2009	002	Residue, Total Dissolv	30D Qty	812.01	942.565	6/1/2009

In addition, frequency violations for failure to properly report analytical results are also listed in the table below.

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
October 2007	002	Nitrogen, Ammonia	2/Week	2	0	10/01/2007
October 2007	002	Nitrogen, Ammonia	2/Week	2	0	10/08/2007
October 2007	002	Nitrogen, Ammonia	2/Week	2	0	10/15/2007
October 2007	002	Nitrogen, Ammonia	2/Week	2	0	10/22/2007
November 2007	901	Phosphorus, Total (P)	2/Month	2	1	11/01/2007
December 2007	901	Phosphorus, Total (P)	2/Month	2	1	12/01/2007
March 2008	901	Phosphorus, Total (P)	2/Month	2	1	03/01/2008
May 2008	901	Phosphorus, Total (P)	2/Month	2	1	05/01/2008
Sept. 2008	002	Water Temperature	1/Day	1	0	09/20/2008
Sept. 2008	002	Water Temperature	1/Day	1	0	09/21/2008
October 2008	002	Total Suspended Solids	2/Week	2	1	10/01/2008
October 2008	002	Nitrogen, Ammonia (NH3)	2/Week	2	1	10/01/2008
October 2008	002	Fecal Coliform	2/Week	2	1	10/01/2008
October 2008	002	CBOD 5 day	2/Week	2	1	10/01/2008
October 2008	002	Phosphorus, Total (P)	2/Week	2	1	10/01/2008
October 2008	002	Dissolved Oxygen	2/Week	2	1	10/01/2008
October 2008	002	Residue, Total Dissolv	2/Week	2	1	10/01/2008
October 2008	601	Total Suspended Solids	1/Week	1	0	10/01/2008
October 2008	601	Nitrogen, Ammonia (NH3)	1/Week	1	0	10/01/2008
October 2008	601	Fecal Coliform	1/Week	1	0	10/01/2008
October 2008	601	CBOD 5 day	1/Week	1	0	10/01/2008
October 2008	601	Phosphorus, Total (P)	1/Week	1	0	10/01/2008
October 2008	601	pH	1/Week	1	0	10/01/2008
October 2008	601	Residue, Total Dissolv	1/Week	1	0	10/01/2008
November 2008	901	Phosphorus, Total (P)	2/Month	2	1	11/01/2008
January 2009	901	Phosphorus, Total (P)	2/Month	2	1	01/01/2009
February 2009	901	Phosphorus, Total (P)	2/Month	2	1	02/01/2009
May 2009	901	Phosphorus, Total (P)	2/Month	2	1	05/01/2009

Be advised that the violations stated above may place Alpine Cheese in Significant Noncompliance with the NPDES Permit. Alpine Cheese must immediately come into compliance with the permit limitations and reporting requirements of the NPDES Permit.

Conclusions

The condition of the treatment system remained unsatisfactory during this most recent inspection which may explain the violations identified above. Following are recommendations regarding the wastewater treatment system. The recommendations are intended to provide Alpine Cheese with possible solutions for attaining full compliance.

1. Alpine Cheese must improve maintenance of the treatment system. Alpine Cheese should review the Operations and Maintenance manual for the treatment system. A maintenance log, including checklists based on the routine maintenance schedule for each piece of equipment, should be developed. In addition, routine maintenance activities for items not in the O&M manual, such as cleaning clarifier weirs, should be added to the maintenance log. Equipment should be routinely maintained in accordance with the O&M manual, and activities should be recorded in the maintenance log.
2. Alpine Cheese must improve operations of the treatment system. Alpine Cheese should provide a greater level of training for the plant operator. The treatment system used by Alpine Cheese requires a significant level of knowledge about treatment operations and process controls. It is recommended that oversight of the treatment system be under at least a Class II operator licensed by Ohio EPA.
3. It is unknown if Alpine Cheese coordinates manufacturing operations with treatment plant personnel. It is unknown the level of commitment that management at Alpine Cheese has towards actual compliance with the NPDES Permit. However, it may be necessary for production to better coordinate with the treatment personnel to ensure that manufacturing operations are not creating problems at the treatment system.
4. The compliance record indicates that compliance with the ammonia and Total Suspended Solids limit is a problem for Alpine Cheese. Since organisms necessary for ammonia removal are sensitive and subject to upsets, ammonia violations are generally an indication that operational procedures and process controls are not appropriate.

Alpine Cheese must determine the cause of the ammonia violations. One parameter that should be monitored is the amount of alkalinity available in the system. Sufficient alkalinity is essential to allow adequate removal of ammonia. Other causes for the ammonia violations may also exist, such as wasting procedures in the production area that may cause upsets of the nitrification system. In order to address the ammonia violations, it is recommended that Alpine Cheese contract with an individual who specializes in biological treatment of cheese wastes so that the cause of violations can be determined and eliminated.

Report Response Showing Good Faith Effort

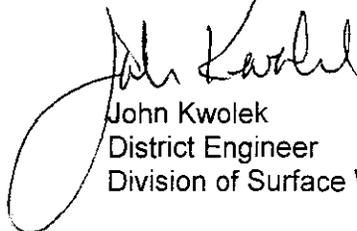
The current concern is regarding compliance with the ammonia and TSS limits. This appears to be associated with operations and maintenance of the Vertical Loop Reactor. The recommendations above provide a few options for exploring the causes of noncompliance.

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In order to show ongoing good faith efforts, Alpine Cheese must provide a response to this inspection report identifying actions that will be taken to achieve full compliance with the NPDES Permit. The response should outline actions that will be taken to identify the causes of violations so that solutions can be determined. In addition, the response should address the recommendations for additional operator training, placing the plant under the direction of an operator with at least a Class II license, and contracting with an individual who specializes in biological treatment of cheese wastes. The response should be provided to this office no later than September 4, 2009.

Finally, this writer recommends that we meet within the next three weeks to discuss the wastewater treatment system in order to exchange opinions and ideas. You may contact this office at (330) 963-1251 to schedule a meeting and to discuss any questions you may have regarding this inspection report.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Brian Barbie, Alpine Cheese
Larry Reeder, Ohio EPA, Enforcement, CO

File: Industrial/Alpine Cheese/Permit and Compliance