



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 10, 2008

RE: GUGGISBERG CHEESE
SUGAR CREEK
3IH00065

CERTIFIED MAIL

Mr. Richard Guggisberg, President
Guggisberg Cheese, Inc.
5060 State Route 557
Millersburg, OH 44654

Dear Mr. Guggisberg:

On November 5, 2008, this office conducted an inspection of the wastewater treatment system serving your Sugar Creek facility. Present during the inspection were this writer and John Kwolek, Ohio EPA NEDO, Eric Phillips, Envirotect, Richard Guggisberg and Jeff Goeg, Guggisberg Cheese.

The treatment system consists of flow equalization, followed by an aeration tank and membrane bioreactors. A chemical feed system is feeding ferric chloride for phosphorus removal. The membranes are cleaned annually.

At the time of the inspection, the treatment system appeared to be in good operation and maintenance condition. The system was producing a clear effluent that appeared to be of satisfactory quality.

The treatment system discharges to Troyer Valley Creek. The bed of the receiving stream contained sewage fungus beginning just upstream of the Guggisberg discharge. The stream bed further upstream was completely covered with a biological growth. The stream in this area is severely degraded.

What is thought to be non-contact cooling water is discharged to a road side ditch at the southeast corner of CR 70 and TR 166. The cooling water discharge was very warm and contained an excessive odor. Iron bacteria were noted in the ditch just downstream of the discharge.

Odors were also emanating from the storm sewers on the north side of the production building which convey the cooling water to the ditch. The odors in this area were much more severe than at the cooling water outfall. Before we can issue a renewal permit, it will be necessary for you to sample the cooling water outfall for ammonia, chemical oxygen demand, total dissolved solids, sulfates, chlorides, pH and temperature. The results of these analyses are to be submitted to this office.

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Whey is being loaded onto tank trucks at the north side of the production building. Whey was noted on the ground adjacent to a storm sewer. It will be necessary for you to make modifications to the loading area so that whey can not wash off site. We recommend that you plug the storm sewer and construct a roof over the loading area. Any spilled material could then be collected and piped to the wastewater treatment plant.

A review of your Discharge Monitoring Reports (DMRs) covering the period January 2005 through September 2008 revealed the following effluent violations:

| Reporting Period | Station | Parameter | Limit Type | Limit | Reported Value | Violation Date |
|------------------|---------|------------------------|------------|-------|----------------|----------------|
| April 2006 | 001 | Biochemical Oxygen Dem | 1D Qty | 1.59 | 3.27478 | 4/11/2006 |
| April 2006 | 001 | Biochemical Oxygen Dem | 30D Qty | 1.06 | 1.18742 | 4/1/2006 |
| March 2006 | 001 | Biochemical Oxygen Dem | 30D Qty | 1.06 | 1.3115 | 3/1/2006 |
| September 2006 | 001 | Biochemical Oxygen Dem | 1D Conc | 30 | 302. | 9/19/2006 |
| September 2006 | 001 | Biochemical Oxygen Dem | 30D Conc | 20 | 151. | 9/1/2006 |
| September 2006 | 001 | Biochemical Oxygen Dem | 1D Qty | 1.59 | 42.7508 | 9/19/2006 |
| September 2006 | 001 | Biochemical Oxygen Dem | 30D Qty | 1.06 | 21.3754 | 9/1/2006 |
| September 2006 | 001 | Dissolved Oxygen | 1D Conc | 5.0 | 2.69 | 9/20/2006 |
| February 2006 | 001 | Biochemical Oxygen Dem | 1D Conc | 30 | 33. | 2/14/2006 |
| February 2006 | 001 | Biochemical Oxygen Dem | 30D Conc | 20 | 31. | 2/1/2006 |
| February 2006 | 001 | Biochemical Oxygen Dem | 1D Qty | 1.59 | 3.25253 | 2/14/2006 |
| February 2006 | 001 | Biochemical Oxygen Dem | 30D Qty | 1.06 | 1.81286 | 2/1/2006 |
| August 2008 | 001 | Total Suspended Solids | 1D Qty | 3.18 | 4.40574 | 8/7/2008 |
| April 2007 | 001 | Total Suspended Solids | 1D Qty | 2.38 | 2.82058 | 4/3/2007 |
| February 2008 | 001 | Total Suspended Solids | 1D Qty | 2.38 | 2.9523 | 2/19/2008 |
| February 2008 | 001 | Total Suspended Solids | 30D Qty | 1.59 | 1.90272 | 2/1/2008 |
| July 2008 | 001 | Total Suspended Solids | 1D Qty | 3.18 | 6.11202 | 7/15/2008 |
| July 2008 | 001 | Total Suspended Solids | 30D Qty | 2.38 | 3.31566 | 7/1/2008 |
| November 2007 | 001 | Total Suspended Solids | 1D Qty | 2.38 | 3.0931 | 11/27/2007 |

The renewal NPDES permit for this facility will be public noticed in the near future. You will have 30 days from the date of public notice to submit written comments to Ohio EPA regarding the draft permit.

As discussed during the inspection, the renewal NPDES permit will have a final effluent limitation for phosphorus of 1 mg/l. It is imperative that you determine the quantity of phosphorus that can be removed from your waste stream as soon as possible. If you determine that you cannot achieve the phosphorus limit proposed in your NPDES permit, you may wish to engage in a nutrient trading program.

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Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1197.

Sincerely,

A handwritten signature in black ink that reads "Dean Stoll". The signature is written in a cursive style with a large initial "D" and "S".

Dean W. Stoll, P.E.
Environmental Engineer
Division of Surface Water

DWS/mt

cc: Dan Martin, AGO
Eric Phillips, Envirotec

File: Industrial/Permit Compliance

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