Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

September 16, 2010

RE: INDUSTRIAL WASTEWATER
HOLMES CHEESE COMPANY
9444 STATE ROUTE 39
NPDES PERMIT NO. 3IH00102

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

Dear Mr. Ramseyer:

On August 30, 2010, this writer along with Reggie Brown of this office conducted an inspection of the Holmes Cheese wastewater treatment plant. The inspection was in response to complaints regarding the condition of the Corns Run.

Receiving Stream

At the time of the inspection, the bottom of Corns Run downstream of the discharge from Holmes Cheese was covered with organic sludge from the wastewater treatment system. The sludge had turned septic in places and was beginning to degrade. No flow was apparent in Corns Run upstream of the discharge location and no sludge deposition was present upstream confirming that the sludge in Corns Run originated at Holmes Cheese. A bright- green alga was growing on the sludge which is indicative of a heavy nutrient load. White foam was apparent on the surface of the water at turbulent locations in the stream. The stream was heavily impacted by the discharge of sludge and nutrients from Holmes Cheese.

The presence of sludge and foam in Corns Run constitutes a violation of Part III, Item 2 of the NPDES Permit and a violation of Ohio Administrative Code (OAC) 3745-1-04(A), (B), (C) and (E).

Treatment System

The new treatment system was not online at the time of the inspection. The new treatment system is intended to eliminate impacts on Corns Run and bring Holmes Cheese into compliance with requirements of the NPDES Permit. You indicated that start-up of the new treatment system created an upset in the existing clarifier. When effluent from the new treatment system combined with effluent from the lagoon system in the clarifier, solids in the clarifier rose to the surface and discharged to Corns Run. It was the understanding of this writer that start-up of the new treatment system was stopped during the week of August 16, 2010. At the time of the inspection, it appeared that the upset had discontinued.

At the time of the inspection, only effluent from the treatment lagoon was being discharged through the clarifier. The effluent from the existing lagoon treatment system was slightly turbid. Samples at outfall 601 and 001 were collected. Results of the effluent samples will be forwarded when received from the lab. The YSI meter was used to monitor conductivity, D.O., temperature and pH at both outfall locations. Following are results from the YSI

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2110 East Aurora Road
Twinsburg, OH 44087-1924

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Parameter	Outfall 601	Outfall 001
Temperature (°C)	30.1	25.1
Conductivity @ 25°C (μhos/ml)	3209	1190
D.O. (mg/l)	1.1	4.79
pH (su)	7.45	7.7

Be advised that the D.O. result for outfall 001 is a violation of the NPDES Permit. The limit for dissolved oxygen in the permit is 5.0 mg/l minimum.

It was the understanding of this writer that start-up of the new treatment system will not be attempted again until proper procedures are developed. It was agreed during the inspection that effluent from the new treatment system will be returned to the lagoon during start-up until it is shown that the effluent quality is in compliance with the appropriate permit limits

Compliance

The monthly monitoring reports were reviewed for compliance with the requirements of the NPDES Permit. The review period includes September 1, 2009 through September 1, 2010. Following are violations reported during the review period.

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	CBOD 5 day	1D Qty	11.2	17.0892	9/15/2009
001	Fecal Coliform	30D Conc	1000	1722.99	10/1/2009
601	Total Suspended Solids	30D Qty	6.30	10.3945	10/1/2009
601	Biochemical Oxygen Dem	30D Conc	23.0	94.	10/1/2009
601	Biochemical Oxygen Dem	30D Qty	4.39	42.2831	10/1/2009
001	Fecal Coliform	1D Conc	2000	2224.	10/6/2009
001	Fecal Coliform	1D Conc	2000	3889.	10/13/2009
001	CBOD 5 day	1D Qty	11.2	14.4057	10/13/2009
601	Biochemical Oxygen Dem	1D Qty	10.27	20.1740	10/13/2009
001	Nitrogen, Ammonia (NH3	1D Qty	1.46	1.69871	10/20/2009
601	Total Suspended Solids	1D Qty	15.17	23.0695	10/27/2009
601	Biochemical Oxygen Dem	1D Conc	54.0	319.	10/27/2009
601	Biochemical Oxygen Dem	1D Qty	10.27	138.852	10/27/2009
001	CBOD 5 day	30D Conc	15	69.	11/1/2009
001	CBOD 5 day	30D Qty	7.32	37.2330	11/1/2009
601	Total Suspended Solids	30D Conc	33.0	34.	11/1/2009
601	Total Suspended Solids	30D Qty	6.30	16.0152	11/1/2009
601	Biochemical Oxygen Dem	30D Conc	23.0	97.	11/1/2009
601	Biochemical Oxygen Dem	30D Qty	4.39	45.3755	11/1/2009
001	CBOD 5 day	1D Conc	23	260.	11/3/2009
001	CBOD 5 day	1D Qty	11.2	138.758	11/3/2009
601	Total Suspended Solids	1D Conc	80.0	85.	11/3/2009
601	Total Suspended Solids	1D Qty	15.17	38.2852	11/3/2009

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	Biochemical Oxygen Dem	1D Conc	54.0	291.	11/3/2009
601	Biochemical Oxygen Dem	1D Qty	10.27	131.070	11/3/2009
601	Biochemical Oxygen Dem	1D Qty	10.27	20.439	11/10/2009
601	Biochemical Oxygen Dem	1D Qty	10.27	26.4798	11/17/2009
001	CBOD 5 day	30D Conc	15	16.	12/1/2009
001	CBOD 5 day	1D Qty	11.2	11.8394	12/1/2009
001	CBOD 5 day	30D Qty	7.32	8.9379	12/1/2009
601	Total Suspended Solids	30D Conc	33.0	75.	12/1/2009
601	Total Suspended Solids	30D Qty	6.30	27.3882	12/1/2009
601	Biochemical Oxygen Dem	30D Conc	23.0	28.6	12/1/2009
601	Biochemical Oxygen Dem	1D Qty	10.27	14.7387	12/1/2009
601	Biochemical Oxygen Dem	30D Qty	4.39	10.2823	12/1/2009
001	Fecal Coliform	1D Conc	2000	5063.	12/8/2009
001	CBOD 5 day	1D Qty	11.2	12.3201	12/8/2009
601	Total Suspended Solids	1D Qty	15.17	20.2497	12/8/2009
001	Fecal Coliform	1D Conc	2000	3011.	12/14/2009
601	Total Suspended Solids	1D Conc	80.0	110.	12/14/2009
601	Total Suspended Solids	1D Qty	15.17	18.3194	12/14/2009
601	Total Suspended Solids	1D Conc	80.0	120.	12/22/2009
601	Total Suspended Solids	1D Qty	15.17	58.5918	12/22/2009
601	Biochemical Oxygen Dem	1D Qty	10.27	21.9719	12/22/2009
001	Fecal Coliform	1D Conc	2000	6000.	12/29/2009
601	Total Suspended Solids	1D Qty	15.17	28.6146	12/29/2009
001	Fecal Coliform	30D Conc	1000	4275.26	1/1/2010
001	CBOD 5 day	30D Conc	15	16.5	1/1/2010
001	CBOD 5 day	30D Qty	7.32	8.94206	1/1/2010
601	Total Suspended Solids	30D Conc	33.0	135.	1/1/2010
601	Total Suspended Solids	30D Qty	6.30	51.3577	1/1/2010
601	Biochemical Oxygen Dem	30D Conc	23.0	23.25	1/1/2010
601	Biochemical Oxygen Dem	30D Qty	4.39	8.95247	1/1/2010
001	Fecal Coliform	1D Conc	2000	6350.	1/5/2010
601	Total Suspended Solids	1D Qty	15.17	24.981	1/5/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	13.1718	1/5/2010
001	Fecal Coliform	1D Conc	2000	8000.	1/12/2010
001	CBOD 5 day	1D Conc	23	24.	1/12/2010
001	CBOD 5 day	1D Qty	11.2	12.0817	1/12/2010
601	Total Suspended Solids	1D Conc	80.0	105.	1/12/2010
601	Total Suspended Solids	1D Qty	15.17	43.3193	1/12/2010
001	Fecal Coliform	1D Conc	2000	3280.	1/19/2010
001	CBOD 5 day	1D Conc	23	42.	1/19/2010
001	CBOD 5 day	1D Qty	11.2	23.6865	1/19/2010
601	Total Suspended Solids	1D Conc	80.0	270.	1/19/2010

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	Total Suspended Solids	1D Qty	15.17	115.480	1/19/2010
001	Fecal Coliform	1D Conc	2000	2005.	1/25/2010
601	Total Suspended Solids	1D Conc	80.0	110.	1/25/2010
601	Total Suspended Solids	1D Qty	15.17	21.6502	1/25/2010
001	Fecal Coliform	30D Conc	1000	1485.40	2/1/2010
601	Total Suspended Solids	30D Conc	33.0	34.75	2/1/2010
601	Total Suspended Solids	30D Qty	6.30	16.0209	2/1/2010
601	Biochemical Oxygen Dem	30D Qty	4.39	5.53367	2/1/2010
601	Total Suspended Solids	1D Qty	15.17	15.5942	2/2/2010
001	Residue, Total Dissolv	1D Conc	2625	3260.	2/16/2010
001	Residue, Total Dissolv	1D Qty	1282	2048.29	2/16/2010
601	Total Suspended Solids	1D Qty	15.17	34.7084	2/16/2010
001	Fecal Coliform	1D Conc	2000	2554.	2/23/2010
001	CBOD 5 day	1D Conc	23	24.	2/23/2010
001	CBOD 5 day	1D Qty	11.2	15.0794	2/23/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	13.6714	2/23/2010
001	Fecal Coliform	30D Conc	1000	1687.06	3/1/2010
001	CBOD 5 day	30D Conc	15	19.8	3/1/2010
001	CBOD 5 day	30D Qty	7.32	9.55637	3/1/2010
601	Total Suspended Solids	30D Conc	33.0	71.8	3/1/2010
601	Total Suspended Solids	30D Qty	6.30	31.4669	3/1/2010
601	Biochemical Oxygen Dem	30D Conc	23.0	26.4	3/1/2010
601	Biochemical Oxygen Dem	30D Qty	4.39	11.7698	3/1/2010
001	Fecal Coliform	1D Conc	2000	5071.	3/2/2010
001	CBOD 5 day	1D Conc	23	50.	3/2/2010
001	CBOD 5 day	1D Qty	11.2	31.4155	3/2/2010
001	Residue, Total Dissolv	1D Conc	2625	3580.	3/2/2010
001	Residue, Total Dissolv	1D Qty	1282	2249.34	3/2/2010
601	Total Suspended Solids	1D Conc	80.0	320.	3/2/2010
601	Total Suspended Solids	1D Qty	15.17	141.710	3/2/2010
601	Biochemical Oxygen Dem	1D Conc	54.0	124.	3/2/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	54.9127	3/2/2010
001	Fecal Coliform	1D Conc	2000	3081.	3/9/2010
001	CBOD 5 day	1D Conc	23	25.	3/9/2010
001	Residue, Total Dissolv	1D Conc	2625	2640.	3/9/2010
001	Residue, Total Dissolv	1D Conc	2625	3160.	3/16/2010
001	Residue, Total Dissolv	1D Qty	1282	1722.32	3/16/2010
001	CBOD 5 day	1D Conc	23	24.	3/23/2010
001	Fecal Coliform	30D Conc	1000	2067.35	4/1/2010
001	Residue, Total Dissolv	30D Qty	854	1167.49	4/1/2010
601	Total Suspended Solids	30D Qty	6.30	13.5162	4/1/2010
601	Biochemical Oxygen Dem	30D Qty	4.39	11.3266	4/1/2010

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Fecal Coliform	1D Conc	2000	2980.	4/6/2010
001	CBOD 5 day	1D Conc	23	28.	4/6/2010
001	CBOD 5 day	1D Qty	11.2	16.9568	4/6/2010
001	Residue, Total Dissolv	1D Conc	2625	2910.	4/6/2010
001	Residue, Total Dissolv	1D Qty	1282	1762.29	4/6/2010
001	Residue, Total Dissolv	1D Qty	1282	1380.65	4/13/2010
601	Total Suspended Solids	1D Qty	15.17	40.2724	4/13/2010
601	Biochemical Oxygen Dem	1D Conc	54.0	90.	4/13/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	45.3064	4/13/2010
001	Residue, Total Dissolv	1D Conc	2625	3050.	4/20/2010
001	Residue, Total Dissolv	1D Qty	1282	2031.78	4/20/2010
001	Residue, Total Dissolv	1D Conc	2625	3100.	4/27/2010
001	Residue, Total Dissolv	1D Qty	1282	1830.42	4/27/2010
001	Residue, Total Dissolv	30D Conc	1750	1862.5	5/1/2010
001	Residue, Total Dissolv	30D Qty	854	2114.85	5/1/2010
601	Total Suspended Solids	30D Conc	33.0	832.5	5/1/2010
601	Total Suspended Solids	30D Qty	6.30	271.338	5/1/2010
001	Fecal Coliform	1D Conc	2000	2546.	5/4/2010
001	Residue, Total Dissolv	1D Conc	2625	3170.	5/4/2010
001	Residue, Total Dissolv	1D Qty	1282	1751.77	5/4/2010
601	Total Suspended Solids	1D Conc	80.0	3320.	5/4/2010
601	Total Suspended Solids	1D Qty	15.17	1080.69	5/4/2010
001	Nitrogen, Ammonia (NH3	1D Qty	1.46	1.72596	5/7/2010
001	Residue, Total Dissolv	1D Conc	2625	3300.	5/18/2010
001	Residue, Total Dissolv	1D Qty	1282	9055.61	5/18/2010
001	Fecal Coliform	1D Conc	2000	2016.	5/25/2010
001	Residue, Total Dissolv	1D Conc	2625	3100.	5/25/2010
001	Residue, Total Dissolv	1D Qty	1282	2252.83	5/25/2010
001	Nitrogen, Ammonia (NH3	1D Qty	1.46	1.52914	5/28/2010
001	Nitrogen, Ammonia (NH3	30D Conc	2.0	9.74189	6/1/2010
001	Nitrogen, Ammonia (NH3	30D Qty	0.98	7.17162	6/1/2010
001	Residue, Total Dissolv	1D Conc	2625	3000.	6/1/2010
001	Residue, Total Dissolv	30D Conc	1750	1882.22	6/1/2010
001	Residue, Total Dissolv	1D Qty	1282	2055.25	6/1/2010
001	Residue, Total Dissolv	30D Qty	854	1439.70	6/1/2010
001	Nitrogen, Ammonia (NH3	1D Qty	1.46	1.80923	6/4/2010
001	Residue, Total Dissolv	1D Conc	2625	3060.	6/8/2010
001	Residue, Total Dissolv	1D Qty	1282	2304.83	6/8/2010
001	Nitrogen, Ammonia (NH3	1D Conc	3.0	79.8	6/22/2010
001	Nitrogen, Ammonia (NH3	1D Qty	1.46	58.2943	6/22/2010
001	Residue, Total Dissolv	1D Conc	2625	3060.	6/22/2010
001	Residue, Total Dissolv	1D Qty	1282	2235.34	6/22/2010

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
601	Total Suspended Solids	1D Qty	15.17	17.6191	6/22/2010
001	Residue, Total Dissolv	1D Qty	1282	1717.17	6/29/2010
001	CBOD 5 day	30D Conc	15	23.5	7/1/2010
001	CBOD 5 day	30D Qty	7.32	18.2730	7/1/2010
001	Residue, Total Dissolv	30D Qty	854	1176.08	7/1/2010
601	Biochemical Oxygen Dem	30D Conc	23.0	33.975	7/1/2010
601	Biochemical Oxygen Dem	30D Qty	4.39	18.6500	7/1/2010
001	CBOD 5 day	1D Qty	11.2	16.4534	7/6/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	13.9098	7/6/2010
001	CBOD 5 day	1D Conc	23	31.	7/13/2010
001	CBOD 5 day	1D Qty	11.2	22.9976	7/13/2010
001	Residue, Total Dissolv	1D Conc	2625	2840.	7/13/2010
001	Residue, Total Dissolv	1D Qty	1282	2106.88	7/13/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	24.657	7/13/2010
001	CBOD 5 day	1D Qty	11.2	16.654	7/20/2010
001	Residue, Total Dissolv	1D Qty	1282	1990.15	7/20/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	16.9568	7/20/2010
001	CBOD 5 day	1D Qty	11.2	16.9870	7/27/2010
001	Residue, Total Dissolv	1D Qty	1282	1745.03	7/27/2010
601	Biochemical Oxygen Dem	1D Qty	10.27	19.0764	7/27/2010

Daily Monitoring Plan

During the inspection, we discussed the need for visually evaluating the effluent quality each day. As agreed, the effluent will be inspected three times per day. If a problem is identified, Holmes Cheese will take the following actions as identified in the September 1, 2010, plan submitted by Holmes Cheese to this office.

- Recirculation into aeration lagoon until clarity is restored
- Holding of influent in new system flow equalization tanks.
- Transport of clarifier effluent to another facility.
- Transport of influent to another facility.
- Land application of clarifier effluent.

It was agreed that you would provide this office a daily update on the effluent observations and provide notice of any upsets of the treatment systems. As agreed, and as required by R.C. 6111.07, effluent discharged to Corns Run must remain in compliance with the NPDES permit including Part III, Item 2.

You may contact this office at (330) 963-1251 to discuss any questions you may have.

Respectfully,

John Kwolek
District Engineer
Division of Surface Water

JK:bo

pc: Larry Reeder, DSW/Enforcement Section

File: Industrial/Holmes Cheese/Permit and Compliance