



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 8, 2012

RE: 3DP00036*BP
GREAT LAKES CHEESE COMPANY, INC.
INDUSTRIAL USER INSPECTION
GEAUGA CO. TROY OAKS WWTP
GEAUGA COUNTY

Mr. Art Butt
Great Lakes Cheese Company, Inc.
17825 Great Lakes Parkway
Hiram, Ohio 44234

Dear Mr. Butt:

On February 15, 2012, representatives of this office conducted an Industrial User Inspection of the above facility. Donna Kniss and Ryan Laake represented the Ohio EPA. You represented the Great Lakes Cheese Company. You provided the membrane bioreactor (MBR) system daily check sheets in a February 15 e-mail, and provided additional information in an e-mail on March 8, 2012. Great Lakes Cheese Company, Inc. (GLC) discharges wastewater to the Geauga County Troy Oaks wastewater treatment plant (WWTP) and has been issued Indirect Discharge (IDP) permit 3DP00036*BP. The purpose of the inspection was to evaluate compliance with the existing IDP.

GLC employs approximately 500-people in a three shift/day five days per week operation. Currently there are two production and one clean-up shift; there will soon be three production shifts with staggered equipment cleaning. There is not an extended shutdown period. GLC operations include slicing, chunking, shredding, and packaging cheese that is manufactured elsewhere.

Facility water is obtained from deep wells; the only water treatment is chlorination. Wastewater is generated during clean-in-place operations on the equipment used in cheese processing. All process wastewater is discharged to a MBR treatment plant for treatment prior to discharge to the sanitary sewer. Noncontact cooling water, boiler water softener backwash, and compressor condensate are also routed to the MBR. Sanitary wastewater is routed directly to the sanitary sewer. Approximately one tanker per week of sludge is removed from the MBR by a third party hauler to be pressed and landfilled.

After GLC demonstrated that all non-domestic wastewater was routed to the MBR system, the sample location for IDP reporting was moved from a downstream manhole to the discharge from the MBR system. The sample location changed when the *BP permit became effective on December 1, 2011.

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MARCH 8, 2012
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A review of the discharge monitoring report (DMR) data in the Ohio EPA databases showed that sampling results were not submitted for 2011. Sampling and analysis had been conducted, and you gave us a copy of the data for the first half of 2011. You indicated that you thought the Geauga County Laboratory was submitting the data. We discussed the fact that GLC is responsible for the contents of the DMR submittal, including certifying the results, and should not delegate its PIN. The current eDMR system allows the Geauga County Laboratory to enter data, and then have GLC review and PIN it.

Currently, composite samples are taken at the combines sanitary/MBR discharge location, and grab samples are taken from the MBR system. As we noted during our inspection, GLC must be careful to report the correct data for each permit, because of the change in sample location. Under the terms of the *AP permit, through November 2011, GLC must report sample results for the combined discharge. For the *BP permit, from December 1, 2011 forward, GLC must report sample results for the MBR discharge.

Because the permit sample location is being moved to the discharge from the MBR system, grab samples are not sufficient for determining compliance with the terms of the discharge permit. Based on our conversation with you about the MBR system operation, we believe that a 24-hour time proportional sample will provide a representative sample for analysis. If there are significant changes in the MBR system operation, please notify this office so we can determine if time proportional sampling still provides a representative sample.

Great Lakes Cheese must submit 2011 data through eDMR to comply with sampling and reporting requirements. Please notify this office when the data has been submitted, and when a composite sampler is connected to the discharge from the MBR system. If you have any questions or comments, please contact me at (330) 963-1285. I can also be reached via e-mail at donna.kniss@epa.state.oh.us.

Sincerely,



Donna J. Kniss
District Engineer
Division of Surface Water
Northeast District Office

DJK/cs

cc: Doug Bowen, Geauga County Water Resources
Ryan Laake, Ohio EPA, DSW, CO

ec: Laura Weber, Ohio EPA, DSW, NEDO

File: Pretreatment Industrial User/Permit-Compliance