



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

March 22, 2012

Re: Pretreatment
Pearl Valley Cheese Co.
Village of West Lafayette
Compliance Inspection
IDP No. ODP00058*AP

Mr. Chuck Ellis, President
Pearl Valley Cheese Company
54760 Township Road 90
Fresno, Ohio 43824

Dear Mr. Ellis:

On March 1, 2012, Aaron Pennington and I inspected Pearl Valley Cheese Company. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and Randy Leitz, Operator, represented Pearl Valley Cheese during the inspection.

General Facility Description:

Pearl Valley Cheese Company produces varieties of Swiss and other cheeses from milk. Wastewaters are generated from whey concentration, cleanup of cheese making tanks and piping, milk delivery trucks and milk storage tanks. Average daily flows were roughly 30,000 gpd since the treatment system became fully operational in August, 2011. Water is supplied by an on-site well. The water is treated by softening and disinfection using chlorine or ultraviolet light.

Pearl Valley Cheese started up its pretreatment system and began discharging to the Village of West Lafayette publicly owned treatment works (POTW) in January 2011. All process wastewater is discharged to the Village of West Lafayette POTW. Sanitary wastewater from Pearl Valley Cheese is treated in an on-site septic system.

Pearl Valley Cheese holds an effective Ohio EPA Indirect Discharge Permit (IDP). The company is regulated by Ohio EPA as a noncategorical significant industrial user.

Pretreatment System:

The pretreatment system consists of equalization using 3 tanks totaling 55,000 gallons, a 364,000 gallon low rate anaerobic contact process reactor, dissolved air floatation clarifier, a moving bed bioreactor (MBBR) for further BOD and ammonia reduction, and a second dissolved air floatation clarifier to remove sludge produced in the MBBR. A 19,000 gallon sludge holding tank is available to store sludge prior to disposal. A

17,000 cubic foot membrane biogas storage unit is provided to store methane prior to consumption in the reactor's heat exchanger and plant boilers. Since the previous inspection, the facility also installed a gas compressor and 3000 gallon tank for additional biogas storage.

Comments:

1. Pearl Valley Cheese reported the following effluent limit violations between January, 2011 and December 2011:

Station	Report Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	7D Qty	31.3	31.7	3/19/2011
001	80082	CBOD 5 day	7D Qty	62.6	115.9	7/1/2011
001	80082	CBOD 5 day	1D Qty	86.9	115.9	7/4/2011
001	00056	Flow Rate	7D Avg	36000	36228	9/16/2011
001	00056	Flow Rate	7D Avg	36000	37600	12/2/2011
001	00530	Total Suspended Solids	7D Qty	31.3	36.4	12/23/2011

Pearl Valley has taken corrective actions to resolve the violations. No further actions are needed at this time.

2. The pretreatment system was performing well on the date of the inspection. Sludge production is roughly 1300 gpd. Pearl Valley Cheese hauled approximately 350,000 gallons of sludge to the West Lafayette POTW between November 2011 and March, 2012. This method of sludge disposal is costly and may present problems for the WWTP by limiting the WWTP's operating flexibility. It is recommended that PVC consider land application of its sludge as the primary disposal method until the West Lafayette WWTP upgrade can be completed or another viable alternative can be identified.

Pearl Valley Cheese has 19,000 gallons, or roughly 14 days of sludge storage capacity. At typical sludge production rates, a minimum of one good weather day every two weeks would enable land application of all sludges. Solids can also be stored in the reactor during periods when inclement weather persists for longer than two weeks.

3. Pearl Valley Cheese has submitted an IDP modification request to increase its flow limits from 50,000 gpd daily maximum to 60,000 gpd and 36,000 gpd weekly average to 50,000 gpd. West Lafayette has an Ohio EPA approved PTI to upgrade its wastewater treatment plant and has applied for funding for the upgrade. Ohio EPA plans to delay action on the IDP modification request to give Coshocton County more time to address limitations in the pumping stations and the West Lafayette more time to achieve progress on the proposed WWTP improvements. Please notify Ohio EPA if it appears it will be necessary for PVC to discharge more than the current permitted flows.

4. Pearl Valley Cheese indicated it was exploring alternatives to discharging to the West Lafayette POTW due to higher than anticipated sewer use charges. Feasible alternatives may include installation of a wetland infiltration system or installation of additional treatment and direct discharge to White Eyes Creek. Please keep Ohio EPA informed of any plans to relocate the discharge so that we may provide you with timely information on permitting requirements.

You may contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell
Pretreatment Coordinator
Division of Surface Water

FJS/dh

Enclosure

- c: Dave Kadri, Village Administrator, Village of West Lafayette
- c: Brian Simmons, Utilities Director, Coshocton County Water and Sewer District
- c: Pretreatment Unit, DSW, CO

Pretreatment Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP000058*AP	OHP000247	March 1, 2012	6	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Pearl Valley Cheese Company 54760 Township Road 90 Fresno, Ohio 43824	10:30 a.m.	December 1, 2010
	Exit Time	Permit Expiration Date
	1:00 p.m.	November 30, 2015

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Chuck Ellis, President Randy Leitz, Operator	(740) 545-6002
Name, Address, & Title of Responsible Official	Phone Number
Chuck Ellis, President	(740) 545-6002

C. AREAS EVALUATED DURING INSPECTION

<u> S </u> Permit	<u> S </u> Flow Measurement	<u> S </u> Pretreatment
<u> S </u> Records/Reports	<u> S </u> Laboratory	<u> N/A </u> Compliance Schedules
<u> S </u> Operations & Maintenance	<u> S </u> Effluent/Receiving Waters	<u> S </u> Self-Monitoring Program
<u> S </u> Facility Site Review	<u> S </u> Sludge Storage/Disposal	<u> </u> Other
<u> S </u> Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.

Fred J. Snell
Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

3/21/12
Date

Jennifer M. Witte
Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office

3/22/12
Date