



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 27, 2013

Re: Pretreatment
Steiner Cheese, Inc.
Village of Baltic
Compliance Inspection
IDP No. ODP00062*AP

Mr. Stanley Mullet, General Manager
Steiner Dairy, LLC
115 Mill Street
Baltic, Ohio 43804

Dear Mr. Mullet:

On June 11, 2013, Tim Fulks and I inspected Steiner Cheese. Also present during the inspection were Tim Griffith, Wastewater Superintendent, and Richard Honaker, Operator, representing the Village of Baltic. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and Nancy Meek, Secretary, represented Steiner Cheese during the inspection. Based on the findings of the inspection, Steiner Cheese remains in violation of its Indirect Discharge Permit.

General Facility Description:

Steiner Cheese produces varieties of Swiss cheese. An average of 1.5 million pounds of milk is received each month in 10 gallon milk cans, along with occasional deliveries in 6000 gallon tank trucks. The cans are cleaned and sanitized on site, while the tank trucks are cleaned at Brewster Cheese. The milk is chilled and conveyed to either a 5000 gallon or 6000 gallon refrigerated tank for storage. In the cheese making process, milk is heat treated before entering a cream separator. The milk then enters cheese making vats where cultures are added. Once curd is formed, it is drained and pressed to remove whey, cut into 220 lb. blocks, brine cured, aged, then cooled for storage. The blocks of cheese are cut and packaged to customer specifications for distribution. Whey is stored in a refrigerated tank prior to hauling to Brewster Cheese.

Wastewater is generated from cleaning and sanitation of milk cans, milk storage tanks, piping, process areas, and cheese making equipment. There is also a blow down from a small boiler at the facility and backwash from a small softening system. Brine used for curing the cheese is discharged approximately once per year. Cheese is made on weekdays and Saturdays. Average daily flow on discharge days was reported as approximately 6100 gallons during the previous year.

Treatment System:

Cutting room sanitation wastewaters are discharged directly to the sanitary sewer. Process flows from all areas except the cutting room flow to a sump prior to pumping to one of two 6100 gallon tanks. After one equalization tank is filled, the valves are changed manually and wastewater is discharged from the filled tank while additional wastewater accumulates in the second tank. The tanks are aerated while filling, but not during discharge. The IDP requires a flow meter capable of measuring and recording instantaneous and total flows. The IDP also requires a minimum runoff period of 16 hours each day. Ball valves on the discharge lines are adjusted to control discharge rates. The discharge rate may gradually slow as debris accumulates in the valves, so the valves must be flushed and adjusted during the day to maintain flow. There is no current method in place to verify the system is providing reliable flow control.

Required Actions:

1. Part 1.B of the IDP required Steiner to install a flow meter on the discharge from Outfall 001 prior to the commencement of discharge to the Baltic sewer. The flow meter was to be capable of accurately measuring and recording instantaneous and total daily flow. Steiner installed a flow meter which was capable of measuring flow, but the meter could not record the instantaneous or total flow. The flow meter failed in March of 2013. Steiner should install a flow meter meeting the above requirements to return to compliance with the IDP. The Village of Baltic has requested that Steiner replace the flow meter and install an automated discharge control system not later than July 1, 2013. Please notify Ohio EPA when the new flow meter and valve system are operational.
2. The equalization tanks are overfilled periodically, releasing wastewaters into the containment system and onto adjacent grounds. Steiner's original drawings of the system showed a pipe connecting the tops of the tanks to allow overflow from one tank to be conveyed to the other tank, but the pipe was not installed. Steiner should either install a high level alarm system or the pipe that was originally proposed to prevent overflows in the future. Overflows may result in slug loading or release of pollutants to a storm drain located near the equalization system, which would be in violation of the IDP or ORC 6111.04, respectively.
3. The secondary containment system for the equalization tanks has a drain that leads directly to the Baltic sewer. Steiner's drawings for the equalization system did not propose installation of this drain. Any failure of the tanks or piping would allow liquids to flow directly to the sewer and may result in slug loading and violations of the IDP. In order for the containment system to function as intended, the containment system drain should be plugged at all times except to remove rain water. Please install a suitable drain plug and notify Ohio EPA when this has been completed.

4. The drawings for the equalization system showed a connection pipe and valve to enable pumping of spilled milk, chemicals or whey from the sump to a tank truck for off-site disposal in the event a spill. The connection and valve were not installed. Please describe how Steiner would transfer liquids released to the sump or secondary containment system for off-site disposal.
5. Part 1.B of the IDP required the facility to develop a Storm Water Pollution Prevention Plan (SWP3) and complete construction of engineering controls for the bulk truck loading areas described in the SWP3 by December 1, 2012. Steiner is in violation of its IDP for failure to construct the engineering controls. Steiner should comply with this requirement immediately. Please provide a schedule with a date when this will be completed.
6. Part 1.A of the IDP requires composite samples for all pollutants except oil and grease and pH, which must be grab samples. Steiner currently collects only a single grab sample for all parameters. Composite samples are defined as a combination of individual samples collected at periodic intervals the entire discharge day. For those parameters that the IDP specifies are to be collected as composite samples, Steiner must collect a series of grab samples throughout the discharge day and combine them into a manual composite sample. The manual composite sample must be refrigerated throughout collection.

Comments:

1. The Village of Baltic and Ohio EPA must be notified in the event of any releases to the sanitary sewer which may cause slug loading. Please notify the POTW as soon as possible at (330) 897-1035, and Ohio EPA at (740) 385-8501. For accidental discharges to waters of the state, please call Ohio EPA's 24 hour Emergency Response line at (800) 282-9378. This requirement is found in Part II, Paragraph 3 of the IDP.
2. Part 1.B., Paragraph 3 of Steiner's IDP required the facility to apply for coverage under the general NPDES permit for Stormwater Associated with Industrial Activity no later than June 1, 2012, including submission of a stormwater pollution prevention plan (SWP3). Steiner submitted the application on August 15, 2012, and Ohio EPA granted approval for coverage under NPDES General Permit OHR00005, Facility Permit Number OGR00509*GD, on August 27, 2012. Final plans for a proposed containment system for the whey and bulk milk loading area were submitted on March 1, 2013. Ohio EPA notified Steiner it concurred with the plans on April 15, 2013. Steiner has yet to begin construction on the containment system.
3. Wastewater from the equalization system may contain insoluble fats and greases and solid trash items. It is uncertain whether the automated flow control system will function without screening the wastewater before it enters the valve.

Steiner should install screening equipment as quickly as practical if problems are identified with solids in the discharge after the automated flow control equipment is in place. Some screening equipment options were discussed during the inspection.

Ohio EPA has initiated enforcement action against Steiner Dairy because the company failed to correct violations of the terms of its IDP and violated ORC 6111.04.

Please respond to this letter in writing, within 30 days.

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: Tim Griffith, Superintendent, Baltic WWTP
- c: Pretreatment Unit, DSW, CO
- c: Trevor Irwin, DERR, SEDO
- c: Ashley Ward, Enforcement Unit, DSW, CO



State of Ohio Environmental Protection Agency
Southeast District Office

Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
ODP00062*AP	OHP000260	June 11, 2013	6	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Steiner Cheese, Inc. 115 Mill Street Baltic, Ohio 43804	10:00 a.m.	February 1, 2012
	Exit Time	Permit Expiration Date
	1:00 p.m.	January 31, 2017
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)	
Nancy Meek, Secretary	(330) 897-5555	
Name, Address, and Title of Responsible Official	Phone Number	
Stanley Mullet, General Manager	(330) 897-5555 (330) 204-6364 cell	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)					
U	Permit	U	Flow Measurement	M	Pretreatment
S	Records/Reports	S	Laboratory	U	Compliance Schedules
M	Operations & Maintenance	M	Effluent/Receiving Waters	M	Self-Monitoring Program
M	Facility Site Review	N/A	Sludge Storage/Disposal		Other
M	Collection System				

Section D: Summary of Findings (attach additional sheets if necessary)			
See attached letter.			
Inspector		Reviewer	
<i>Fred J. Snell</i>		<i>Jennifer M. Witte</i>	
	6/26/13		6/26/13
Fred J. Snell	Date	Jennifer M. Witte	Date
Division of Surface Water Southeast District Office		Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	