UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 10, 2006

In Reply Refer To: WTR-7

Dermot O'Brien, Director of Operations
Dairy Farmers of America
Golden Cheese Company of California
1138 West Rincon
Corona, California 92880-9601

Re: June 22, 2005 Clean Water Act Inspection

Dear Mr. O'Brien:

Enclosed is the report for our June 22, 2005 pretreatment inspection of Golden Cheese. Please submit a short response to the findings in Sections 2 through 5 of this report, to EPA, Orange County, the Santa Ana Watershed Project Authority, and the Regional Water Quality Control Board, by **April 30, 2006**.

The main findings are summarized below:

1 The excellent design and capacity of the wastewater treatment in general and the deep-shaft bioreactors specifically has resulted in consistent compliance with all sewer discharge limits since mid-2001. There is no evidence that treated discharges from Golden Cheese have adversely affected the sewers and treatment works.

2 The wastewater treatment is also well designed to avoid emergency bypassing of treatment primarily because there are dual biological treatment trains plumbed in parallel.

3 The sample record for Golden Cheese is usable to determine compliance since the sampling is representative over the sampling day's operations and the reporting period.

This report brings to an end EPA's long-running involvement in the regulation of the wastewater discharges from Golden Cheese to the domestic sewers. Our involvement began during our 1998 review of the Orange County and City of Corona pretreatment programs. In that year, we first inspected Golden Cheese and issued an Administrative Order to require compliance with the local limits advanced by Orange County and applied by the Santa Ana Watershed Project Authority for discharges into the Santa Ana Regional Interceptor brine line. In response to this order and to permits subsequently issued by the Santa Ana Watershed Project Authority, Golden Cheese constructed the deep-shaft wastewater treatment plant now in operation and provided monthly self-monitoring reports of its wastewater discharges to the sewers.

This report covers our inspection last year and our final review of the self-monitoring reports submitted by Golden Cheese through 2005. In light of the findings, Golden Cheese no longer needs to report self-monitoring to EPA.

I certainly appreciate your helpfulness extended to me during this inspection and over the years, as well as your professional, thoughtful and consistent attention to compliance and reporting. I remain available to Orange County, SAWPA and to you to assist in any way. Once again, thank you for your cooperation during this inspection. Please do not hesitate to call me at (415) 972-3504 or e-mail at arthur.greg@epa.gov.

Sincerely,

Greg V. Arthur
CWA Compliance Office

Enclosure

cc: Dave Francis, OCSD
Gary DeFrese, G&D Environmental for SAWPA
Julio Lara, RWQCB-Santa Ana

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 9

CLEAN WATER ACT COMPLIANCE OFFICE

NPDES COMPLIANCE EVALUATION INSPECTION REPORT

Industrial User:	Dairy Farmers of America Golden Cheese Company of California, Corona Facility 1138 West Rincon Street, Corona, California 92880-9601 Non-Categorical Significant Industrial User
Treatment Works:	Santa Ana Regional Interceptor Brine Line Santa Ana Watershed Project Authority Orange County Sanitation District Fountain Valley Wastewater Reclamation Plant No.1 and Huntington Beach Wastewater Treatment Plant No.2 (NPDES Permit CA0110604)
Date of Inspection:	June 22, 2005

Inspection Participants:

US EPA:	Greg V. Arthur, Region 9, CWA Compliance Office, (415) 972-3504
RWQCB-Santa Ana:	Julio Lara, Water Resources Control Engineer, (951) 782-4901 Najah Amin, Water Resources Control Engineer, (951) 320-6362
Orange County SD:	Doug Francis, Source Control Inspector, (714) 593-7479
SAWPA:	Gary DeFrese, G and D Environmental Compliance, (951) 588-1714
Golden Cheese:	Dermot O'Brien, Director of Operations, (951) 493-4702

Report Prepared By:	Greg V. Arthur, Environmental Engineer March 9, 2006

1.0 Scope and Purpose

On June 22, 2005, EPA, the California Regional Water Quality Control Board Santa Ana Region (“RWQCB”), the Orange County Sanitation District (”OCSD”), and the Santa Ana Watershed Project Authority ("SAWPA") conducted a compliance evaluation inspection of Dairy Farmers of America, Golden Cheese Company of California, Corona Facility ("Golden Cheese"), in Corona, California. The purpose was to ensure compliance with the Federal regulations covering the discharge of non-domestic wastewaters into the sewers. In particular, it was to ensure:

- Classification in the proper Federal categories;
- Application of the correct standards at the correct sampling points;
- Consistent compliance with the standards; and
- Fulfillment of Federal self-monitoring requirements.

Golden Cheese is a significant industrial user (“SIU”) contributing to the SAWPA Santa Ana Regional Interceptor ("SARI") brine line which feeds into the OCSD sewer service area. Compliance with pretreatment requirements including the requirement to successfully cause the regulation of extra-jusrisdictional industrial users was assessed as part of a 2005 evaluation of the OCSD pretreatment program by the RWQCB, its contractor, Tetra Tech, and EPA. The inspection participants are listed on the title page. Arthur conducted the inspection of Golden Cheese on June 22. See Appendix 1 and the photos in item 1.7 on page 4 of this report.

1.1 Process Description

Golden Cheese processes 1.8 billion pounds of milk per year to produce cheese, shredded cheese, alcohol, whey protein concentrate, whey powder, and milk-solids animal feed supplements at 1138 West Rincon Street in Corona, California. This inspection did not involve a tour of the processing operations. However, from previous inspections and from the Golden Cheese web-site, the facility operations include milk receiving by tanker truck, product storage, blending, pasteurization, cheese vat formation of curds and whey, curds and whey separation, cheddaring, milling, salting, blockforming, ageing, shredding, whey purification and drying, distillation and alcohol fermentation. Power is provided by a co-generation electrical power plant located next to Golden Cheese.

The Golden Cheese web-site:
http://ourworld.compuserve.com/homepages/gccc/3d.htm

1.2 Facility SIC Code

Golden Cheese is assigned the SIC codes for manufacturing natural cheese and cheese manufacturing by-products such as whey (SIC 2022), and for industrial ethyl alcohol production (SIC 2869).

1.3 Facility Wastewater Sources and Composition

This inspection did not involve a detailed determination of the facility wastewater sources, the water quality of the individual wastewater sources nor the wastewater generation schedules and variability. In general, Golden Cheese generates clean-in-place wash waters, spents, and rinses, as well as plant and equipment washdown, boiler blowdown, cooling tower blowdown, water softener regenerant, and air conditioner condensate. The various clean-in-place units provide phosphoric acid descaling, nitric acid cleaning, alkaline cleaning, and chlorinated disinfection.

1.4 Facility Process Wastewater Treatment

Golden Cheese operates two deep-shaft aerobic bioreactors to reduce the organic cheese wastes loading in the wastewaters. High-strength wastewaters from the clean-in-place units undergo screening, equalization, and cooling through a heat exchanger prior to feeding into the bioreactors. The mixed liquors leaving the bioreactors undergo polymer flocculation and dissolved air flotation ("DAF") clarification. Some DAF float splits as return activated sludge. DAF subnatant combines with the remaining low-strength wastewaters for equalization and final polishing through an induced air flotation ("IAF") unit. The reduction in organics loading average 90%, from ~30,000 to ~3,000 lbs BOD per day.

The deep-shaft bioreactors are 12 feet in diameter and 320 feet deep. Each bioreactor and attendant DAF clarifier operates as a separate treatment unit with an individual design capacity of 1.2 million gpd and rated capacity of 35,000 lbs BOD per day. The extreme depth greatly increases the dissolved air transfer rate thereby increasing the biological uptake of organics. The bioreactors and DAF clarifiers operate at a mean cell residence time of around 7 days and obtain partial nitrification. The return DAF float activated sludge and air is injected at a depth of 280 feet.

Waste activated sludge from the two DAF clarifiers and solids float from the final IAF unit are pumped to a sludge holding tank for sludge dewatering. However, until September 2005, the Golden Cheese sludges were dewatered through a dedicated filter press at the City of Corona Wastewater Treatment Plant No.1.

1.5 Sewer Discharge and Compliance Sampling

Golden Cheese discharges its non-domestic and domestic wastewaters to the SARI brine line and on to the OCSD wastewater treatment plants. Until September 2005, Golden Cheese also discharged its sludges and solids to the City of Corona wastewater treatment plant No.1 for sludge processing and filter press filtrate discharge to the SARI brine line. As a result, there are two sewer connections into the domestic sewers designated in this report as IWD-A for the permitted discharge at Golden Cheese from compliance sampling Point A, and IWD-B for the permitted discharge at the Corona WWTP No.1 from compliance sampling Point B.

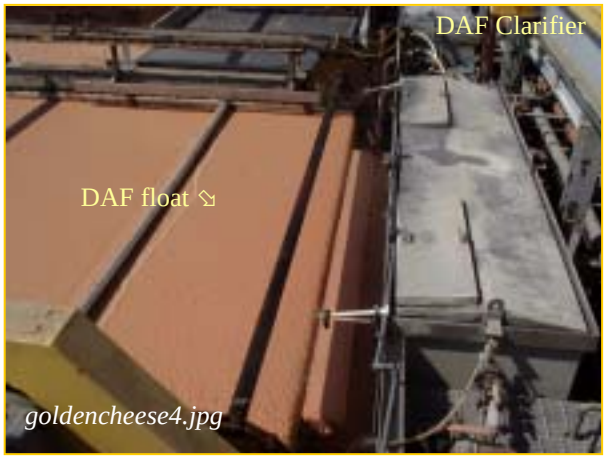
1.6 POTW Legal Authorities

Orange County Sanitation District – OCSD operates an EPA-approved pretreatment program as required by the State of California in the RWQCB's Waste Discharge Requirements, No. R8-2004-0062, reissued in 2004, and serving as NPDES Permit No. CA0110604. As part of this, OCSD established sewer use Ordinance No.1 that applies to all industrial users of its sewer system. Under this authority, OCSD also entered into a multijuridictional agreement with SAWPA to allocate capacity rights and establish interceptor limits for contributions into the OCSD sewer system from the SARI brine line.

Santa Ana Watershed Project Authority – SAWPA established sewer use Ordinance No.4 that applies to the industrial users discharging directly into the SARI brine line as well as to combined domestic/non-domestic connections from the contributing jurisdictions. Under this authority, SAWPA issued industrial user permit No. 4B-92-S13 covering the sewer discharges from Golden Cheese through IWD-A and IWD-B.

1.7 Photo Documentation

Arthur took five digital photographs to document this inspection. The file names are *goldencheese1.jpg, ~2.jpg, ... ~5.jpg*. Three of the photographs are depicted below. The others were duplicates or alternate views.



Top left (*goldencheese4.jpg*) shows float skimming from the surface of one of the DAF clarifiers. Top right (*goldencheese5.jpg*) shows the subnatant from the induced air flotation unit and final discharge to the brine line. Left (*goldencheese3.jpg*) shows the exposed crown of one bioreactor shaft.

Photos Taken by: Greg V. Arthur
Date: June 22, 2005

Appendix 1
Golden Cheese, Corona
Schematic of the Wastewater Collection and Treatment