OHIO E.P.A.

JAN 12 2016

ENTERED DIRECTOR'S JOURNAL

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

E.S. Steiner Dairy, LLC	:	
115 R Mill Street	:	**Director's Final Findings**
Baltic, Ohio 43804,	:	**and Orders**
Respondent		

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By Dawn Lassiter Date: 1/12/16

PREAMBLE

It is agreed by the Parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to E.S. Steiner Dairy, LLC ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("EPA") under Ohio Revised Code (ORC) §§ 6111.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and its assigns and successors in interest liable under Ohio law. No change in the ownership of the Facility as defined in Finding No. 1 of these Orders shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 6111 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has made the following findings:

1. E.S. Steiner Dairy, LLC ("Respondent") is an Ohio limited liability company that owns and operates a facility located at 115 Mill Street, Baltic, Tuscarawas, Ohio ("Facility"). Respondent produces Swiss cheese at the Facility.

2. Respondent began operating in approximately May 2011, after the Facility was acquired from Steiner Cheese, Ltd. Steiner Cheese, Ltd. closed the Facility in January 2011.

3. Wastewater generated at the Facility includes: (1) Wastewater generated from cleaning and sanitation of milk cans, milk storage tanks, piping, process areas, and cheese making equipment; (2) Blow down from a small boiler; and (3) Brine water used for curing cheese. The wastewater generated at the Facility is "industrial waste" as defined in ORC § 6111.01.

4. The wastewater, except the brine water, is discharged daily on the days that cheese is made, Monday through Saturday, to the Village of Baltic sanitary sewer system. The average daily flow is approximately 6,100 gallons, but the flow can be as much as 10,000 gallons per day. The brine water is discharged to the Village of Baltic sewer approximately once a year in February.

5. From the resumption of operation in approximately May 2011 until May 27, 2012, the Village refused to accept wastewater from the Facility until the Facility met several conditions, so Respondent hauled its wastewater to the City of Coshocton's publicly owned treatment works ("POTW"). During 2012, Respondent hauled brine water off site and disposed of it in a farm manure pit without obtaining approval of plans for the disposal.

6. The disposal of brine water in the farm manure pit without prior approval of plans constitutes a violation of ORC § 6111.45 and Ohio Administrative Code ("OAC") 3745-42-02.

7. In August 2011, Respondent submitted an application for an Indirect Discharge Permit ("IDP") to Ohio EPA. An IDP, No. 0DP00062*AP, was issued for the Facility, effective February 1, 2012, authorizing Respondent to discharge wastewater from the Facility into the Village of Baltic's POTW after compliance with a schedule contained in the IDP.

8. Respondent's IDP required Respondent to install a flow meter capable of accurately measuring and recording instantaneous flow rate and total daily flow on the wastewater discharge from outfall 001 prior to commencing the discharge to the Village of Baltic sanitary sewer. Respondent installed a flow meter on outfall 001, but it did not record. This flow meter failed in March 2013 but was repaired or replaced by the end of June 2013. There have been failures of the flow meter periodically since July 2014. The flow meter was replaced at the end of June 2015.

9. Respondent's IDP required Respondent to submit to Ohio EPA by March 2, 2012, plans and specifications for facilities to provide equalization and slug discharge control for the discharge to the Village of Baltic, and initiate and complete construction of such facilities after approval by Ohio EPA. The IDP required that the equalization and slug discharge control facilities be fully operational prior to commencing the discharge to the Village of Baltic.

10. Prior to commencing discharge to the Village of Baltic, Respondent submitted plans and specifications for facilities to provide equalization and slug discharge control and constructed two 6100 gallon tanks, a blower and air lines, piping and valves for switching tanks, and manual flow control valves. Process flows from all areas of the Facility except the cutting room flow to a sump prior to being pumped to one of the 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 discharge piping included a bypass pipe and valve on the equalization system so Respondent could bypass the equalization tanks and pump directly to the POTW, although bypassing is prohibited by Respondent's IDP. Respondent capped the bypass in October 2012.

11. Respondent's IDP required Respondent to submit an application for coverage under Ohio EPA's General Storm Water Permit for Industrial Activity and a storm water pollution prevention plan ("SWP3") by not later than June 1, 2012, to complete construction of engineering controls described in the SWP3 by November 1, 2012, and to submit written verification of completion of each of these requirements within fourteen days after its completion.

12. Respondent submitted a notice of intent for coverage under Ohio EPA's Industrial Storm Water General Permit on August 17, 2012. Coverage was granted on August 27, 2012 under Permit No. 0GR00509*GD. An SWP3 was not submitted until October 15, 2012, and it was incomplete. Ohio EPA provided comments to Respondent requesting additional information on the SWP3 on October 19 and 23, 2012, but Respondent has not submitted a complete SWP3.

13. On September 13, 2012, Respondent requested an extension of time until spring 2013 to construct the engineering controls described in the SWP3. On September 14, 2012, Ohio EPA denied the requested extension. Nevertheless, final plans for a proposed containment system for the whey and bulk milk loading area were not submitted until March 1, 2013. Ohio EPA notified Respondent that it concurred with the plans on April 15, 2013. Respondent completed construction of the containment system in July 2013.

14. Part II.3 of Respondent's IDP requires that slug loads be reported to the POTW for the Village of Baltic within one hour of discovery with specified information, in accordance with Part III.10 of the IDP, and to follow this with a written report containing the same information within five days of the slug loading. Slug loading is defined in Part III.1 of the IDP to mean "any pollutant, including oxygen demanding pollutants, released in a discharge at a flow rate and/or pollutant concentration as to cause interference in the POTW."

15. Respondent's discharge of slug loads to the Village of Baltic's POTW interferes with Baltic's ability to meet the effluent limitation for phosphorus in its National Pollutant Discharge Elimination System ("NPDES") permit. Respondent is, therefore, a significant industrial user as defined in OAC 3745-3-01 and 3745-36-02.

16. Between January 2013 and June 2015, the semi-annual industrial user monitoring reports submitted by Respondent as required by its IDP reported the following violations of the effluent limitation for pH in Respondent's IDP:

Station	Reporting Code	Parameter	Limit	Reported Value	Violation Date
001	00402	pH, Minimum	5.0	4.85	1/17/2013
001	00402	pH, Minimum	5.0	4.25	3/28/2013
001	00402	pH, Minimum	5.0	4.66	4/24/2013
001	00402	pH, Minimum	5.0	4.03	5/7/2013
001	00402	pH, Minimum	5.0	3.56	6/12/2013
001	00402	pH, Minimum	5.0	4.28	11/29/2013
001	00402	pH, Minimum	5.0	4.78	3/4/2014
001	00402	pH, Minimum	5.0	4.51	5/6/2014
001	00402	pH, Minimum	5.0	4.02	6/3/2014
001	00402	pH, Minimum	5.0	4.89	4/7/2015
001	00402	pH, Minimum	5.0	4.44	5/7/2015

Respondent asserts that the pH violations were the result of the delay in analysis when taking the samples to the laboratory for analysis. Samples are now analyzed on-site.

17. Respondent's IDP requires measurement of flow daily and reporting of the flow measurements in the semi-annual industrial user monitoring reports. In 2012, required flow measurements were not reported for 131 days, in the July through December 2013 report, required flow measurements for 177 days were not reported, in the July through December 2014 report, required flow measurements for 23 days were not reported, and in the January through June 2015 report, required flow measurements for 28 days were not reported.

18. Respondent failed to report monitoring data for any of the parameters listed in the table of final effluent limitations in Part I, A of its IDP for the months of February, March, April, and May 2012.

19. Respondent failed to report monitoring data for oil and grease for any of the six months covered by the July through December 2014 industrial user monitoring report, and failed to report monitoring data for nitrogen, ammonia for August, September, and October 2014. For both the oil and grease and nitrogen, ammonia for these months, Respondent reported "AK," which is not an appropriate reporting code for these parameters.

20. Respondent failed to submit copies of the January through June 2013, the July through December 2013, and the July through December 2014 industrial user monitoring reports to the Village of Baltic, as required by Part II, Paragraph 2 of Respondent's IDP.

21. On April 12, 2012, the Village of Baltic observed a release of process wastewater from Respondent's Facility to a storm sewer leading to Brush Run. The Village contacted Respondent and requested that Respondent submit written documentation to the Village about the cause of the release.

22. Respondent submitted an undated letter to the Village stating that the release was caused by a hose through which wastewater was flowing from the building to a tanker truck bursting, allowing the wastewater to flow into a catch basin and the creek.

23. Brush Run is "waters of the state" as defined in ORC § 6111.01.

24. Pursuant to ORC § 6111.04(A), no person shall cause pollution or place or cause to be placed any sewage, sludge, sludge materials, industrial waste, or other wastes in a location where they cause pollution of any waters of the state. Such an action is prohibited under ORC § 6111.04(A) and is declared to be a public nuisance unless the person causing pollution or placing or causing to be placed wastes in a location in which they cause pollution of any waters of the state holds a valid unexpired permit, or renewal of a permit, governing the causing or placement as provided in ORC §§ 6111.01 to 6111.08 or if the person's application for renewal of such a permit is pending, and the placement or discharge is in compliance with the permit.

25. The term "pollution" as defined in ORC § 6111.01 includes, but is not limited to, the placing of "industrial waste" in any "waters of the state."

26. OAC 3745-33-02 prohibits any person from discharging any pollutant from a point source to waters of the state without applying for and obtaining an NPDES permit.

27. Respondent discharged industrial waste from its Facility to waters of the state through a point source as defined in OAC 3745-33-01. Respondent has not applied for, nor obtained, an NPDES permit governing the causing of pollution or placement of industrial waste in waters of the state.

28. ORC § 6111.07(A) prohibits any person from violating, or failing to perform any duty imposed by sections 6111.01 to 6111.08 of the Revised Code or violating any order, rule, or term or condition of a permit issued or adopted by the Director of Environmental Protection pursuant to those sections. Each day of violation is a separate offense.

29. The violations of effluent limitations and monitoring and reporting requirements described in Findings No. 16 through 20 are violations of Respondent's IDP and of ORC § 6111.07.

30. The discharge of industrial waste into waters of the state from Respondent's Facility, as described in Findings Nos. 21 and 22, was not authorized by or in accordance with a valid, unexpired permit issued by the Director and, therefore, violated ORC §§ 6111.04 and 6111.07.

31. Respondent's IDP, Part II.3, requires Respondent to notify Ohio EPA by telephone within 24 hours of an accidental discharge to waters of the state.

32. Respondent's failure to notify the Ohio EPA by telephone within 24 hours of the discharge violates Respondent's IDP and ORC § 6111.07.

33. On July 27, 2012, Respondent contacted Ohio EPA's spill hotline to report the discharge of approximately 1000 gallons of whey to a storm sewer leading to Brush Run due to a bottom valve on a tanker truck into which whey was being loaded having been left open.

34. OAC 3745-1-04 provides, in part, that the following general water quality criteria shall apply to all surface waters of the state including mixing zones: To every extent practical and possible as determined by the Director, these waters shall be: (C) Free from materials entering the waters as a result of human activity producing color, odor or other conditions in such a degree as to create a nuisance.

35. Respondent's discharge of whey on July 27, 2012 caused a violation of the water quality standard found in OAC 3745-1-04(C) by discharging substances into the storm sewer and Brush Run as a result of human activity that altered the natural color or other conditions of Brush Run in such a degree as to create a nuisance.

36. Ohio EPA's Division of Emergency and Remedial Response ("DERR") responded and investigated the release on July 27, 2012. DERR issued a notice of violation ("NOV") to Respondent which also stated that Respondent was "to make every reasonable attempt to collect the whey that entered the creek" using a tanker truck and a pump. Respondent complied with this recommended action.

37. Respondent's discharge of whey to waters of the state without a permit violated ORC §§ 6111.04 and 6111.07.

38. On December 19, 2012, while at the Facility for a meeting, an Ohio EPA inspector observed wash water flowing to a storm drain leading to Brush Run near the cutting room. This discharge to waters of the state without a permit violated ORC §§ 6111.04 and 6111.07.

39. On December 31, 2012, Respondent sent a letter to Ohio EPA describing plans to prevent the wash water from the cutting room from flowing to the storm drain and to direct the flow to the sanitary sewer instead. On March 7, 2013, Respondent notified Ohio EPA that the construction had been completed on March 1, 2013. Cutting room sanitation wastewaters are now discharged directly to the sanitary sewer.

40. On October 15, 2012 and March 1, 2013, in response to Ohio EPA's request in an August 7, 2012 compliance inspection letter, Respondent submitted plans for a containment berm in the bulk milk and whey loading area. Ohio EPA responded with some suggested modifications on April 15, 2013, and asked Respondent to construct the structure.

41. During an inspection at the Facility on April 12, 2013, Ohio EPA noticed that cream was being pumped into a tanker truck on the opposite side of the building from the proposed containment area, and in an email sent to Respondent on April 15, 2013, expressed concern that a spill of cream could flow to a storm drain and then to Brush Run. Respondent proposed that the loading of cream into a truck would be monitored both inside and outside the building to prevent a spill from flowing to the storm drain.

42. Ohio EPA inspected the Facility on July 25, 2012, June 11, 2013, June 25, 2014,

and January 22, 2015. Compliance inspection letters were sent to Respondent on August 7, 2012, October 19, 2012, June 27, 2013, and August 29, 2014, following these inspections. These letters listed violations observed at the Facility and actions needed to bring the Facility into compliance.

43. Ohio EPA also visited the Facility on December 7, 2011, December 19, 2012, April 12, 2013, and May 20, 2013, to discuss the Facility's discharges and pretreatment issues. These visits were followed by emails from Ohio EPA to Respondent on December 20, 2012, April 15, 2013, and May 24, 2013, concerning the matters discussed at the meetings. Several other emails have been exchanged between Ohio EPA and Respondent.

44. In the October 19, 2012 compliance inspection letter, Ohio EPA requested that Respondent work with the Village to install safeguards on the bypass pipe and valve on its equalization system (described in Finding No. 10) to prevent unauthorized bypasses from occurring. This has reportedly been completed.

45. During May 2013, the Village of Baltic requested that by July 1, 2013, Respondent replace the failed flow meter with an automated discharge control system and flow meter capable of recording the flow from Outfall 001. Ohio EPA included this request in its June 27, 2013 compliance inspection letter.

46. A flow control system which uses a recording flow meter and automatic valve was installed and operational in September 2013. A stainless steel screening device was also added in September 2013 to protect the automatic valve from debris.

47. In July 2013, Respondent rerouted the drains in the equalization tank containment area to convey wastewater from any releases within the containment area to the influent sump. However, Respondent failed to submit drawings of the revised drain system to Ohio EPA prior to completing the construction. Respondent submitted as-built drawings on November 15, 2013, and submitted updated drawings on February 20, 2015.

48. In August 2013, Respondent installed a high level visual alarm system on the equalization tanks.

49. By April 2014, Respondent had submitted an Operation and Maintenance Plan that was acceptable to Ohio EPA.

50. Compliance with ORC Chapter 6111 is not contingent upon the availability or receipt of financial assistance.

51. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sanitary sewerage system. Any such construction or modification is subject to the permit to install (PTI) requirements of ORC §§ 6111.44 and 6111.45 and OAC Chapter 3745-42.

52. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and their relation to the benefits to the people of the state to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

V. ORDERS

1. Preventing overflows from the equalization tanks:

   a. If an overflow from the equalization tanks is detected, Respondent shall immediately investigate the cause of the overflow, including investigating the equalization tank high water level alarms, and shall correct the cause of the high water level and the overflow.

   b. If overflows continue after Respondent completes the actions required by Order No. 1.a., Respondent shall immediately install an additional visual alarm or an audio alarm or take other equivalent measures for notifying personnel when there is high water in the equalization tank system.

2. Within thirty (30) days after the effective date of these Orders, Respondent shall repair or replace the aeration system in the equalization tanks if needed and shall begin aerating the tanks during both filling and discharging. Respondent shall notify Ohio EPA in writing in accordance with Section X. of these Orders within seven (7) days of completing the work if the aeration system is repaired or replaced.

3. Within seven (7) days of completion of Orders 1.a or 1.b, Respondent shall notify Ohio EPA in writing in accordance with Section X. of these Orders of the completion of the requirement.

4. Respondent shall assign employees to monitor from both inside and outside the building the loading of cream into trucks and the loading and unloading of whey and bulk milk onto or from trucks in order to prevent a discharge to waters of the

state and the Baltic sanitary sewer.

5. Within ninety (90) days after the effective date of these Orders, Respondent shall revise the SWP3 for the Facility in accordance with Respondent's Industrial Storm Water General Permit, No. 0GR00509*GD, Ohio EPA's comments provided to Respondent on October 19 and 23, 2012, and current conditions at the Facility, and shall submit the revised SWP3 to Ohio EPA for review, in accordance with Section X. of these Orders. In the alternative, within thirty (30) days of the effective date of these Orders, Respondent may submit a no exposure certification in accordance with Part 1.5 of Respondent's Industrial Storm Water General Permit, No. 0GR00509*GD.

6. Respondent shall properly operate and maintain all components of its treatment works at all times.

7. Respondent shall fully implement its Operation and Maintenance Plan at all times.

8. Respondent shall comply with all terms and conditions of its IDP, No. 0DP00062*AP, including all effluent limitations and all monitoring and reporting requirements, and any modifications and renewals thereof.

9. Respondent shall not install or modify a disposal system at the Facility without first obtaining a permit to install or a plan approval from the Director as required by OAC 3745-42-02 and ORC § 6111.45.

10. Respondent shall pay the amount of twenty-four thousand dollars ($24,000.00) in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 6111. The penalty shall be paid by tendering official checks made payable to "Treasurer, State of Ohio" totaling nineteen thousand two hundred dollars ($19,200.00), in accordance with the schedule below. The official checks shall be submitted to Carol Butler, or her successor, together with letters identifying the Respondent at:

    Ohio Environmental Protection Agency
    Office of Fiscal Administration
    P.O. Box 1049
    Columbus, Ohio 43216-1049

    (a) By no later than November 1, 2015, Respondent shall pay to Ohio EPA the amount of three thousand dollars ($3,000.00).

(b) By no later than February 1, 2016, Respondent shall pay to Ohio EPA the amount of three thousand dollars ($3,000.00).

(c) By no later than May 1, 2016, Respondent shall pay to Ohio EPA the amount of three thousand dollars ($3,000.00).

(d) By no later than August 1, 2016, Respondent shall pay to Ohio EPA the amount of three thousand dollars ($3,000.00).

(e) By no later than November 1, 2016, Respondent shall pay to Ohio EPA the amount of three thousand dollars ($3,000.00).

(f) By no later than February 1, 2017, Respondent shall pay to Ohio EPA the amount of three thousand dollars ($3,000.00).

(g) By no later than May 1, 2017, Respondent shall pay to Ohio EPA the amount of six hundred dollars ($600.00).

(h) By no later than August 1, 2017, Respondent shall pay to Ohio EPA the amount of six hundred dollars ($600.00).

Photocopies of the checks shall be sent to Ohio EPA, in accordance with Section X. of these Orders.

11. In lieu of paying the remaining four thousand eight hundred dollars ($4,800.00) of the civil penalty, Respondent shall fund a supplemental environmental project ("SEP") by making a contribution in the amount of four thousand eight hundred dollars ($4,800.00) to Ohio EPA's Clean Diesel School Bus Fund (Fund 5CD). Respondent shall tender official checks made payable to "Treasurer, State of Ohio" totaling four thousand eight hundred dollars ($4,800.00), in accordance with the schedule below. The official checks and cover letters identifying the Respondent shall be submitted to Carol Butler, or her successor at:

Ohio Environmental Protection Agency
Office of Fiscal Administration
P.O. Box 1049
Columbus, OH 43216-1049

(a) By no later than May 1, 2017, Respondent shall pay to Ohio EPA the amount of two thousand four hundred dollars ($2,400.00).

(b) By no later than August 1, 2017, Respondent shall pay to Ohio EPA the amount of two thousand four hundred dollars ($2,400.00).

Photocopies of the checks shall be sent to Ohio EPA, in accordance with Section X. of these Orders.

12. Should Respondent fail to fund the SEP within the required time frame set forth in Order No. 11, Respondent shall immediately pay to Ohio EPA the remaining four thousand eight hundred dollars ($4,800.00) of the civil penalty by no later than September 1, 2017 in accordance with the procedures in Order No. 10.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of the Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(E).

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to activities occurring on or at Respondent's Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and

regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to the Facility.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency
Southeast District Office
Division of Surface Water
Attn: DSW Enforcement Unit Supervisor
2195 Front Street
Logan, Ohio 43138

and to:

Ohio Environmental Protection Agency
Lazarus Government Center
Division of Surface Water
Attn: Manager, Compliance and Enforcement Section
50 West Town Street, Suite 700
[P.O. Box 1049]
Columbus, Ohio 43215 [43216-1049]

[For mailings use the post office box number and zip code in brackets]

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII. of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:
Ohio Environmental Protection Agency

Craig W Butler
Director

1/7/16
Date

IT IS SO AGREED:
E.S. Steiner Dairy, LLC

Signature

10-20-15
Date

Stanley Mullet
Printed or Typed Name

president
Title