Ohio Environmental Protection Agency

MEMORANDUM

These files were reviewed to determine whether records contained herein are confidential or otherwise exempt from the disclosure obligations of R.C. 149.43. Pursuant to R.C. 149.43(A)(1)(v), some records were removed or redacted as their release is otherwise prohibited by law as infrastructure records in accordance with R.C. 149.433(B)(2).

Should you have any questions regarding this issue, please contact Ohio EPA's Office of Legal Services.

(This memorandum is to remain visibly attached to this file.)

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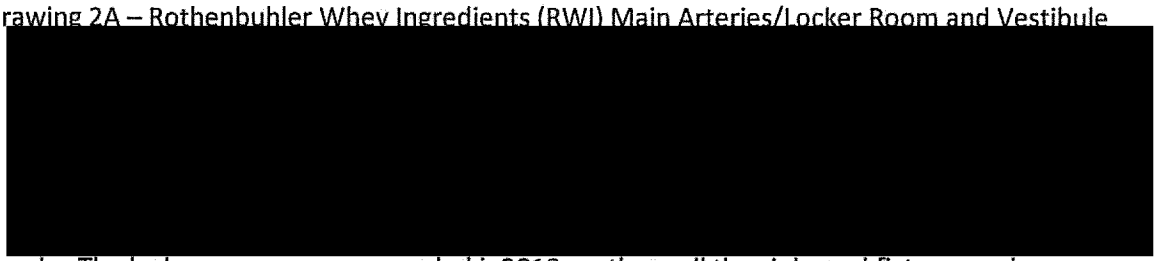
Rothenbuhler Cheesemakers, Inc.
Lead/Copper Narrative Description
PWS ID = OH2835412
March 7, 2017

Introduction:
The Rothenbuhler Cheesemakers Campus is made up of multiple buildings that have been built from 1956 to 2016 in multiple stages as the company has grown. The buildings show numerous upgrades and renovation projects. The majority of the water piping within the complex is plastic, PVC and stainless steel but there are a few areas of copper piping primarily in the smaller pipes closer to the fixtures. Most of the main's throughout the plant are NON-Copper. The narrative below will walk thru each page of the submitted maps bringing details that may not be on the maps.

1. Drawing 1 – Site Plan
    a. The site plan shows four buildings. Water comes into the plant at the Northern most part of Rothenbuhler Whey Ingredients(B02). Piping from the well to storage tanks is in HDPE and PVC. The storage tanks, which are indicated by 6 circles on the north side of B02, are the starting point for the water to the campus.
    b. Building B01 is the Cheesemaking, warehouse, Office and store complex. This building ranges in age from 1956, where there is NO original piping, to the east most construction from 2001. Because of the varying age of portions of the building, the plumbing has been upgraded over time based on renovations and upgrades that have happened thru the years. This building is used primarily for the manufacture of Cheese.
    c. Building B02 – B02 is the whey manufacturing facility and is called Rothenbuhler Whey Ingredients, Inc. Since the water utility is on the North end of this building, water is distributed from this point to all four buildings. This building was originally a warehouse in 1982 but added a Dryer wing in 1989, an Evaporator wing and utility room in 1992, and a Boiler room in 2013.
    d. Building B03 – B03 is the Waste Water Treatment Plant built in 2001.
    e. Building B04 – B04 is the BVF building built in 2015-2016. Note that there is copper piping in this building but based on the year of the install, there should be no risk with this piping.

2. Drawing 2A – Rothenbuhler Whey Ingredients (RWI) Main Arteries/Locker Room and Vestibule



    d. The locker rooms were upgraded in2010, so there all the sinks and fixtures and copper near the fixtures will be manufactured around 2010. The vestibule sink fixture would be installed in 2014.

e [redacted]

f

3. Drawing 2B – RWI Dryer piping downstairs.
    a. This building was built in 1989.
    b. All copper in the building was installed 1989 or later.
    c. The copper in this building is a 1" hot water loop and a number of drops off of that loop. That loop circulates from the West Utility, circulates around the dryer room then returns to the West utility room.
    d. Note that there is one leg of the copper, identified as GG, that runs all the way to the top of the equipment to provide hot water to the sink.
    e. The copper provides water to hose stations, foot sprays, equipment sprays and hand washing sinks. The fountain, control room sink were installed in 2014.

4. Drawing 2C – RWI Dryer Upstairs piping
    a. As mentioned before, this building was constructed in 1989.
    b. Hot water is run thru copper piping to 4 hand washing and equipment washing sinks.
    c. Fixtures on the TOP of the dryer would have been installed around 1989. The evaporator sink could be installed no earlier than 1992.
    d. All copper in the dryer building was installed 1989 or later.

5. Drawing 3 – Rothenbuhler Cheesemakers (RC) Building B01.
    a. Overview of the floor plan of the Cheesemaking plant.
    b. Water is sourced from the entry point that is located in the RWI plant.
    c. There is a branch header in the UTILITY Room located in the SW corner of the RC plant that feeds each of the various sections of the RC plant as outlined on this drawing.

[redacted]

7. Drawing 3B – RC Milk Receiving Bays & Driver lounge
    a. Milk Receiving Bays and Driver lounge were renovated in 1995.
    b. Copper was used in the Drivers Bathroom, waiting room extensively to feed bathroom fixtures, sink, milk sample ice machine, fountain, hose and hot water heater. All installed around 1995.
    c. Copper was used for hot water lines to the two hand washing sinks in the receiving bay. Receiving bay sink fixtures were installed circa 2014.
    d. Lead Copper sampling location **LC202** is the sink in the receiving bay.

8. Drawing 3C – Vat and MKT area piping
    a. This section of the plant is fed from the Manifold pictured in Drawing 3A labeled KK.
    b. The MKT area on this drawing was built in 1985
    c. The 1" copper line that goes around the perimeter of the MKT area could be the original piping from 1985. This line services a number of Safety showers and a hand washing sink. The sink fixtures on the east end of MKT and the Vat 1 Hand Wash sink were installed in 2014
    d. The smaller copper lines that feed the Lab area, including two hand wash sinks, was part of a renovation that happened in 2014 so the piping and fixtures would be installed in 2014.
    e. The East stairwell sink was installed in 2014.

9. Drawing 3D – Warehouse, Bulk Cut and shipping
    a. This section of the plant is fed from the manifold pictured in Drawing 3A labeled LL.
    b. The Blue Room area was renovated in 1999, so the copper in this drawing was from that time period.
    c. The copper here serves the Blue Room Bathroom with a sink, urinal and toilet. Fixtures from 1999.
    d. Additionally, it services one hand wash sink (installed in 2014)in the Bulk Cut room.
    e. Copper piping is found at the far east end of the plant in the Shipping receiving area which was constructed in 2000. Fixtures in the bathroom were installed in construction.
    f. The sink and fountain by Shipping and Receiving were added in 2014.
    g. Fixture in the warm room 6 were installed in 2014

10. Drawing 3E – Office/Store Lower area
    a. The office is fed from a 2" PVC line that is depicted from Drawing 3D.
    b. Note that the EPA designate **DS000** location is the Men's locker room sink located on this drawing.
    c. Note that Lead/Copper sampling point **LC203** is located on this drawing and is the Mail room sink. Note that the Lead lab result was <2ug/l for this location.

d. Once in the Lower area of the Office, this piping changes to copper. This building was put up in 1983 so although there have been a number of renovations. Store renovation in 1998 and Locker room in 1999 replaced all first floor fixtures.
e. All fixtures have been updated over the years with renovations
    i. First floor Locker room in 1999
    ii. Basement locker room in 2011
    iii. Basement Break room in 2013
    iv. Cheesehouse remodeling in 2015
    v. Office Breakroom in 2017

11. Drawing 3F – Office/Store Upper area
    a. Upper floors are fed from two risers from the basement.
        i. 2" copper riser for cold water
        ii. 1" riser for Hot water
    b. These risers will feed
        i. 1st floor Men's bathroom(1998)
        ii. 1st floor Women's bathroom(1998)
        iii. Store sink(1998) cold water **(LC204).** Note that the Lead lab result was <2ug/l for this location.
        iv. 2nd level Men's bathroom(Faucet replaced 2017)
        v. 2nd level Women's bathroom (Faucet replaced 2017)
        vi. 2nd level floor sink for mop buckets
        vii. Office upstairs break room(remodeled in 2017)**(LC205).** Note that the Lead lab result was greater than the acceptable threshold. This high result was due to the faucet fixture which has been subsequently been removed with the 2017 break room remodeling.

12. Drawing 4 – WWTP building (B03)
    a. The WWTP building was constructed in 2001.
    b. Water is fed from an underground Plastic line FROM the Building B02. All piping upstream is NON copper.
    c. Once into the WWTP building, the original domestic piping in the building was copper as shown on the map.
    d. All fixtures are from the original 2001 construction.
    e. A 1.5" copper piping was all installed in 2016 as a transfer line to the new BVF building. The line is copper in the WWTP building and transitions to plastic for an underground feed to the BVF building.
    f. All fixtures are from the original 2001 construction.

13. Drawing 5 – BVF Building (B04)
    a. The BVF building was constructed in 2016.
    b. This building is fed from a plastic underground pipe from the WWTP building.
    c. All piping and fixtures were installed in 2016.

Summary:

Per the Ohio House Bill 512, we have mapped the water system, submitted the sampling locations and provided a narrative of the Copper/lead piping on the entire facility. It is notable that all Lead/Copper sampling locations were tested at <2ug/l, except the office second floor Kitchen sink. We have determined that this fixture was an original fixture, installed in 1983. The fixture has been removed and replaced with a 2017 faucet so we do not expect any other exceedances as this was likely the oldest fixture on site and most other fixtures on site have been replaced in remodeling endeavors as outlined in the narrative.

If you have any questions, please contact Gary Schoenwald at 440.632.6008 or at my email which is GaryS@RCheese.com.

Best Regards,

Gary Schoenwald
CAO