

**AGENCY OF NATURAL RESOURCES  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
1 NATIONAL LIFE DRIVE, MAIN 2  
MONTPELIER, VT 05620-3521**

**DRAFT  
INDIRECT DISCHARGE PERMIT**

Permit No.: ID-9-0055  
PIN: NS93-0006

**SECTION A - "ADMINISTRATION"**

In compliance with provisions of 10 V.S.A. §1263 and in accordance with the following conditions, the permittee:

Grafton Village Cheese Company  
400 Linden Street  
Brattleboro, Vermont 05301

is authorized to discharge non-sewage whey and washwater from the permittee's cheese manufacturing facilities located in Grafton and Brattleboro, Vermont to groundwater and indirectly into the South Branch of Saxtons River, Hinkley Brook, Saxtons River, West River and the Connecticut River. **This is a permit renewal.**

A1. Permit Summary:

Expiration Date	December 31, 2020
Type of Waste	Non-sewage dairy processing whey and washwater
Disposal Method	Land Application
Design Flow (whey and washwater)	Annual limit of 5,500,000 gallons (average of 15,068 gallons/day)
Towns	Grafton, Newfane, Townshend, Brookline, Rockingham, Brattleboro, Vernon, Putney, Dummerston and Westminster
Drainage Basins	Saxtons River, West River, Connecticut River

A1. Permit Summary (continued):

This indirect discharge permit authorizes the indirect discharge of whey from the permittee's Grafton and Brattleboro cheese manufacturing facilities to approved agricultural fields, manure pits, and an anaerobic digester, and authorizes the indirect discharge of washwater generated at the Grafton facility to approved agricultural fields and manure pits. Washwater generated at the Brattleboro facility is discharged to the Brattleboro wastewater treatment facility and therefore is not subject to the terms of this permit. The indirect discharge of dairy processing whey and washwater via land application satisfies the criteria of 10:1 dilution between the receiving stream flow and wastewater at low median monthly flow in accordance with the Vermont Guidelines for Land Application of Dairy Processing Wastes. This permit contains daily and annual application limits for whey and washwater land applied to agricultural fields, and limits for disposal to manure pits and an anaerobic digester.

A2. Compliance Schedule:

The following is a summary of the actions and requirements necessary for compliance with the conditions of this permit. The permittee shall complete the requirements in accordance with the dates indicated. See the designated section for specific details.

<u>Condition # &amp; Description</u>	<u>Schedule Date</u>
A3. Apply for renewal of Indirect Discharge Permit	By September 30, 2020
D11. Submit monthly disposal report	By the 15th of each month
E1. Submit revised Quality Assurance/ Quality Control Plan	By September 30, 2016
E2. Install new monitoring wells	By November 30, 2016
E3. Collect and analyze whey and washwater samples	April and August
E4(A). Collect and analyze groundwater samples	August and September
E4(B). Measure and record the depths to groundwater in observation wells	Prior to land application on well-verified fields
E5(A). Collect and analyze surface water samples	August and September

A2. Compliance Schedule (continued):

<u>Condition # &amp; Description</u>	<u>Schedule Date</u>
E5(B). Perform biological monitoring	Upon request
E6. Submit all monitoring results	By the 15th of the second month following the date of sampling
E7. Perform Soil Monitoring	Upon request
E8. Submit toxic scan analysis	By September 30, 2020
E9. Submit water quality evaluation	By September 30, 2020

A3. Expiration Date:

This permit, unless revoked, or amended shall be valid until December 31, 2020, despite any intervening change in the Vermont Groundwater Rule and Strategy, the Vermont Water Quality Standards, or the classification of receiving waters. Renewal of this indirect discharge permit will be subject to all rules applicable at the time of renewal, including biological standards to determine significant alteration of aquatic biota.

The permittee shall apply for an indirect discharge permit renewal by September 30, 2020 for authorization to land apply whey and washwater beyond the permit expiration date. For the purposes of Title 3, an application for renewal of this permit will be considered timely if a complete application is received by the expiration date.

A4. Effective Date:

This permit becomes effective on the date of signing.

A5. Revocation:

The Secretary may revoke this permit in accordance with 10 V.S.A. §1267.

A6. Transfer of Permit:

This permit is not transferable without prior written approval of the Secretary. The permittee shall notify the Secretary immediately, in writing, before any sale, lease or other transfer of ownership of the property from which the permitted discharge originates. The proposed transferee shall make application for a permit to be reissued in their name. Failure to apply shall be considered a violation of this permit. Responsibility for compliance with the conditions of this permit shall be the burden of the permittee until such time as transfer of the permit to the transferee is complete. All application and operating fees must be paid in full prior to transfer of this permit. This permit shall be transferred only upon showing by the permittee or proposed transferee of compliance with the following conditions:

- a. The transferee shall be a legal entity, financially and technically competent to operate, inspect, maintain and replace the system.
- b. The transferee shall demonstrate that they have the legal authority to raise revenues for the proper operation, inspection, and maintenance of the system.
- c. The transferee shall provide a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee(s) to the Secretary.

A7. Minor Modifications of Permits:

The Secretary may modify this permit without requiring a permit application, a public notice, or a public hearing to correct typographical errors or increase the monitoring frequency in accordance with Section F "Compliance Review" of this permit.

A8. Indirect Discharge Rules and Other Applicable Standards:

This indirect discharge was originally reviewed and qualified for an Indirect Discharge Permit in accordance with Section 14-C-1000(D) of the Indirect Discharge Rules, effective January 15, 1990, the Vermont Guidelines for Land Application of Dairy Processing Wastes, dated August 14, 1990, and the Groundwater Protection Rule and Strategy, Section 12-503(3), effective November 15, 1997.

For the purposes of this permit renewal, the permittee applied under Section 14-406(d) of the Indirect Discharge Rules, effective April 30, 2003. This indirect discharge is presumed to be in compliance with the Groundwater Protection Rule and Strategy, effective February 14, 2005, and the Vermont Water Quality Standards, effective October 30, 2014.

A9. Right of Agency to Inspect:

The permittee shall make arrangements to insure that the Secretary or the Secretary's authorized representative upon the presentation of their credentials may enter upon any fields or inspect any manure lagoons being used as disposal sites.

The permittee shall allow the Secretary or the Secretary's authorized representative upon the presentation of their credentials and at reasonable times:

- a. To enter upon permittee's premises in which any effluent source, treatment or disposal system is located or in which any records are required to be kept under the conditions of the permit;
- b. To have access to and copy any records required to be kept under conditions of this permit;
- c. To inspect any monitoring equipment or method required in this permit;
- d. To sample any discharge of waste, groundwater or surface water; and
- e. To inspect any collection, treatment, pollution management and disposal facilities required by this permit.

A10. Permit Availability:

A copy of this permit shall remain at the office of the permittee and, upon request, shall be made available for inspection by the Secretary.

A11. Additions and Modifications to Attachments A and B:

The permittee may add or modify disposal fields to the list in Attachment A or manure pits/anaerobic digesters to the list in Attachment B under the following procedures:

- a. The permittee may add fields, manure pits or anaerobic digesters to the disposal program by first applying for an administrative amendment to this permit. Fields and manure pits shall be evaluated in accordance with the Vermont Guidelines for Land Application of Dairy Processing Wastes. Disposal to an anaerobic digester shall be evaluated by the Vermont Agency of Agriculture for storage and nutrient loading capacity.

A11. Additions and Modifications to Attachments A and B (continued):

- b. Fields, manure pits or digesters that are removed from the disposal program shall be reported to the Secretary. Fields that exhibit clogging conditions or excessive leaching of cations to groundwater shall also be removed from the disposal program and reported to the Secretary.

A12. Operating Fees:

This indirect discharge is subject to operating fees. The permittee shall submit the operating fees in accordance with the procedures provided by the Secretary.

**SECTION B - "INDIRECT DISCHARGE"**

B1. Location of Indirect Discharges:

The indirect discharges are located in the Saxtons River, West River and Connecticut River drainage basins in the towns of Grafton, Newfane, Townshend, Rockingham, Brattleboro, Brookline, Vernon, Putney, Dummerston and Westminster, Vermont.

B2. Nature of Indirect Discharge:

The permittee has two cheese making facilities, the original facility in Grafton, Vermont and a newer facility in Brattleboro, Vermont. The indirect discharge authorized by this permit is the food processing wastewater generated from the production of cheese at both facilities, which is classified as non-sewage, non-pathogenic waste. The waste consists of whey generated at both facilities, and washwater generated at the Grafton facility. Washwater generated at the Brattleboro facility is discharged to the Brattleboro municipal wastewater collection system.

The Vermont Guidelines for the Land Application of Dairy Processing Wastes dated August 14, 1990 apply to this discharge. Due to the biochemical oxygen demand and nitrogen content of the whey, the land application of whey is limited to a maximum rate of one-half inch per year. There must be a minimum of three-foot separation to groundwater at the time of application. The maximum allowable land disposal volumes are limited to provide a low median monthly stream flow to whey and washwater volume ratio of at least 10:1.

## **SECTION C - "SYSTEM SPECIFICATIONS"**

### **C1. System Specifications:**

This permit authorizes the land application of whey from both facilities, and washwater from the Grafton facility. Whey and washwater is pumped into disposal trucks owned by the permittee and transported to the disposal fields where the whey and washwater is discharged to the land via a spreader bar or spray nozzle. Whey and washwater are also sprayed on Field 1G via spray nozzles.

This permit also authorizes the disposal of whey and washwater to the manure pits identified in Attachment B, which have a total capacity of 6,198,650 gallons. Ten percent of the volume of these pits, 619,865 gallons, may be used for the disposal of whey and washwater. This mixture of whey or washwater and manure shall be spread according to Acceptable Agricultural Practices as defined by the Vermont Department of Agriculture.

This permit also authorizes the disposal of whey to the anaerobic digester identified in Attachment B, subject to the nutrient loading limitations specified in the large farm operation permit issued by the Vermont Agency of Agriculture.

## **SECTION D - "SYSTEM OPERATION"**

### **D1. General:**

The disposal of whey and washwater shall be performed at all times in a manner that will (1) not permit the surface runoff of whey or washwater to waters of the State; (2) not permit the disposal of whey or washwater when groundwater is within 36 inches of the surface; (3) not permit the disposal of whey or washwater at a site with ponding water or where runoff is occurring; (4) not result in a violation of the Groundwater Protection Rule and Strategy; and (5) not result in a violation of Vermont Water Quality Standards.

### **D2. Limits on Land Application:**

This permit authorizes the indirect discharge of whey and/or washwater at an average daily rate of 15,068 gallons per day, for a total yearly maximum discharge volume of 5,500,000 gallons.

The amount of whey disposed of on any field shall not exceed a total of 13,576 gallons/acre/year (0.5" per acre per year). For those fields designated as observation-well-verified for year round use, the maximum application rate of whey shall not exceed 6,788 gallons/acre/year (0.25" per acre per year).

D2. Limits on Land Application (continued):

The amount of washwater disposed of on any field shall not exceed a total of 27,152 gallons/acre/year (1.0" per acre per year). For those fields designated as observation-well-verified for year round use, the maximum application rate of washwater shall not exceed 13,576 gallons/acre/year (0.5" per acre per year).

Under no circumstances shall the land applied volume exceed the discharge volumes listed in Attachment A-2, "Approved Disposal Fields". The disposal volumes listed in Attachment A-2 are expressed in terms of gallons of washwater-equivalent units. **For the purpose of determining compliance with the disposal limits of each field, the land application of one gallon of whey will be considered equivalent to two gallons of washwater, including on those fields designated as observation-well-verified for year round use.**

The permittee shall not apply the whey and/or washwater at a rate exceeding 0.25 inches (6,788 gallons/acre) per day in the summer (May 15th through September 15th) and 0.13 inches (3,530 gallons/acre) per day in the fall, winter and spring (September 16th through May 14th).

D3. Hours of Operation for Land Application:

When using a truck equipped with a spray nozzle the permittee shall land apply washwater or whey only between one-half hour before sunrise to one-half hour after sunset. The sunrise and sunset times utilized for this purpose shall be those published in the Brattleboro Reformer.

D4. Disposal Area:

Adequate disposal area must be available at all times for land application. The acreage available for disposal must be a minimum of 120% of the facilities' dairy processing whey and washwater flow in each season in accordance with the Vermont Guidelines for Land Application for Dairy Processing Wastes.

	<u>Acreage Necessary for Disposal</u>	<u>120% of Acreage</u>	<u>Acreage<sup>(1)</sup> Available</u>
SUMMER (124 days)	68.8	82.6	910.4
FALL (61 days)	33.9	40.6	893.2
WINTER/SPRING (180 days)	99.9	119.9	815.4

<sup>(1)</sup> Some of these fields are designated as observation well verified. The depth to groundwater in these fields shall be measured and recorded at least once in the previous 36 hours prior to application.

D4. Disposal Area (continued):

The acreage available for winter and spring is combined since the criteria for winter and spring application is the same. These fields may also be used in the summer or fall. The winter/spring fields are designated as year round in Attachment A-2, "Approved Disposal Fields." Fields that meet the criteria for fall application according to the Vermont Guidelines for Land Application for Dairy Processing Wastes may be used in the summer.

D5. Operator Certification:

The permittee is required at all times to employ a chief operator that shall supervise and be responsible for all aspects of the dairy processing waste collection, treatment, and disposal operation under this permit. This individual shall hold an Industrial Class I operator certificate from the Department of Environmental Conservation in accordance with the Wastewater Treatment Facility Operator Certification Rule, dated September 25, 2014. The permittee shall submit to the Secretary in writing the name of the chief operator and notify the Secretary in writing immediately of any change of operator.

D6. Landowner Agreement:

The permittee may add disposal fields to the approved list in Attachment A (see Condition A11). For any disposal field that is not owned by the permittee, a written and signed agreement is required between the landowner and the Grafton Village Cheese Company, stating the agreement of the owner to allow application on the fields. It is acceptable for the Grafton Village Cheese Company to terminate an agreement provided there still is sufficient area available to dispose of 120% of the whey and washwater produced in each season.

D7. Disposal Vehicle:

The permittee shall visually inspect the spreader devices each day of use and clean as necessary to reduce clogging and uneven distribution. If the disposal vehicle owned by the Grafton Village Cheese Company is unavailable for use, the permittee shall retain a private hauler capable of proper land application or disposal of whey and washwater. The permittee shall notify the Secretary if the private hauler is used and the dates of use.

D8. Other Methods of Disposal:

The permittee may dispose of dairy processing whey and washwater in the manure pits identified in Attachment B, up to a maximum of ten percent of the volume of each manure pit, annually, as outlined in the Vermont Guidelines for Land application of Dairy Processing Wastes. The permittee shall record the daily volume added to the pits, dates and location of the manure pits and submit this information in the monthly disposal report (see Condition E6). The mixture of dairy processing whey, washwater and manure shall be spread according to Accepted Agricultural Practices as defined by the Vermont Agency of Agriculture. A written agreement is required between the permittee and the farmer, stating that the farmer or applicator accepts responsibility for the application of the waste.

The permittee may dispose of whey to the anaerobic digester identified in Attachment B, subject to the nutrient loading limitations of a large farm operation permit issued by the Vermont Agency of Agriculture. The permittee shall record the date and daily volumes added to the digester and submit this information in the monthly disposal report (see Condition E6).

The permittee may utilize a spray disposal system on Field 1G at times when conditions do not allow the use of disposal vehicles with spreader bars (e.g. in the spring). The permittee shall comply with all the applicable spray disposal limitations.

The permittee may dispose of dairy processing whey and washwater once in the summer to hayfields that do not meet the soil/site criteria in Table 1 of the Vermont Guidelines for Land Application of Dairy Processing Waste, under the following conditions:

1. The application shall take place within two weeks following the cutting of the first hay crop;
2. The maximum application rate shall not exceed 0.25 inches/acre (6,788 gallons) and will be limited to 0.125 inches/day (3,394 gallons);
3. The slope shall not exceed 20%;
4. The field must meet all minimum isolation distances outlined in Table 1;
5. Application may not take place in swales or on saturated ground.

The permittee shall record the volume, date and location of the field and submit this information in the monthly disposal report (see Condition E6).

D9. Other Restrictions:

The permittee shall conduct the land application of dairy processing whey and washwater in accordance with the Vermont Guidelines for Land Application of Dairy Processing Wastes and the conditions of this permit. The application rate may not be increased without written approval by the Secretary.

The permittee shall not allow any person to discharge or cause to be discharged from the manufacturing facilities anything other than the dairy processing whey and washwater described herein to the disposal fields or farms.

D10. Daily Journal:

The permittee shall maintain a bound, daily journal in the disposal vehicles owned by the permittee, with printed, pre-numbered pages, that shall remain with the vehicles. The driver of the vehicle shall enter in ink their name, the field name, field number, type of waste land applied, and time of actual disposal on the field. For those fields that have both summer-fall and year round application areas, the driver shall record in the journal which area received the whey or washwater. The driver shall record any observations, including standing water, surface runoff, and groundwater level observations. The driver shall also record any incidence of accidental spraying, spillage that occurs during spraying, or any other incidents that may adversely affect the landowner, adjacent landowners, or other members of the public. The driver shall sign and date the entries made by him/her each day. The journal shall be available for inspection by the Secretary, and copies of journal entries shall be submitted upon request.

D11. Monthly Disposal Report:

The permittee shall submit a monthly written report to the Secretary listing the dates of application, the fields which were utilized for disposal, the depth to groundwater in the monitoring wells in fields designated as observation well verified, and the volume of whey and washwater applied on each field.

For those fields that have both summer-fall and year round application areas, the report shall indicate which area(s) received the whey or washwater. If other methods of disposal are utilized by the permittee, the volume and destination shall be submitted.

The monthly disposal report shall note any incidence of accidental spraying, spillage that occurs during hauling, or any other incidents that may adversely affect the landowner, adjacent landowners, or other members of the public.

The number of gallons applied on each field or delivered to farms shall be totaled daily and monthly, and the report submitted by the 15th of each month, and shall include all land application activity which occurred in the previous month.

## **SECTION E - "MONITORING"**

### **E1. Updated Quality Assurance/Quality Control Plan:**

By September 30, 2016, the permittee shall submit an updated Quality Assurance/Quality Control (QA/QC) plan to the Secretary for review and approval. The updated QA/QC Plan shall include provisions for groundwater sampling at a minimum of two additional fields, expanded monitoring of Field 1D, and add sampling of the South Branch of Saxtons River.

The laboratory identified in the QA/QC plan shall demonstrate successful performance for U.S. EPA check samples for all parameters and shall analyze any check samples provided by the Secretary. Failure to obtain an acceptable result for either the Secretary or EPA check samples may be a basis for requiring an alternate analytical laboratory.

### **E2. Fields Used for Groundwater Monitoring:**

By November 30, 2016, the permittee shall install monitoring wells on a minimum of two additional fields in accordance with an approved QA/QC Plan. Monitoring wells shall be installed on fields that are used routinely for land application during the summer months. In addition, a minimum of two additional monitoring wells shall be installed on the edge of Field 1D further downstream of the existing monitoring wells. The Secretary may request groundwater monitoring on additional fields if the Secretary or designated representative determines it is necessary.

Each year during the summer months, the permittee shall land apply the maximum amount of whey and washwater possible, within the disposal limits specified in Attachment A-2, on the fields designated for groundwater monitoring.

E3. Whey and Washwater Monitoring:

The whey and washwater to be spread on the disposal fields shall be sampled and analyzed as follows:

<u>Parameter</u>	<u>Units</u>	<u>Type</u>	<u>Sample Frequency</u>
Flow	gpd	daily total	Daily
Biochemical Oxygen Demand (5-day)	mg/L	grab	April and August
Chemical Oxygen Demand (whey only)	mg/L	grab	April and August
Total Dissolved Solids	mg/L	grab	April and August
Total Phosphorus	mg/L	grab	April and August
Total Dissolved Phosphorus	mg/L	grab	April and August
Chloride	mg/L	grab	April and August
Sodium	mg/L	grab	April and August
Total Kjeldahl Nitrogen (TKN)	mg/L	grab	April and August
Ammonia Nitrogen	mg/L	grab	April and August
Nitrite-Nitrate Nitrogen	mg/L	grab	April and August
pH	S.U.	grab	April and August
Depth to groundwater (below ground surface)	inches		At time of sampling

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 Samples shall be taken at the line which is used to fill the disposal truck.

E4. Groundwater Monitoring:

A. Chemical:

The monitoring wells identified in an approved QA/QC Plan required in Condition E2 above shall be sampled and analyzed for the following parameters:

<u>Parameter</u>	<u>Units</u>	<u>Type</u>	<u>Sample Frequency</u>
Total Dissolved Solids	mg/L	grab	August and September
Total Phosphorus	mg/L	grab	August and September
Total Dissolved Phosphorus	mg/L	grab	August and September
Chloride	mg/L	grab	August and September
Sodium	mg/L	grab	August and September
Total Kjeldahl Nitrogen (TKN)	mg/L	grab	August and September
Ammonia Nitrogen	mg/L	grab	August and September
Nitrite-Nitrate Nitrogen	mg/L	grab	August and September
pH	S.U.	grab	August and September
Depth to groundwater (below ground surface)	inches		At time of sampling

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 Because of the changing water table conditions the samples from the groundwater monitoring wells might not be collected on the same day or in the same week. If a monitoring well has water at any time during the sampling month, then a sample is required to be collected and analyzed.

B. Groundwater Levels for Well-Verified Fields:

The depth to groundwater (below ground surface) shall be measured and recorded in the observation wells for all well-verified fields immediately prior to the spraying of wastewater. No spraying shall be conducted if groundwater is closer than three (3) feet to the ground surface as based on these measurements. Dry wells shall be recorded as "no water to depth of well". Groundwater level measurements shall be recorded in the driver's logbook even when groundwater is less than 36 inches from ground surface.

E5. Receiving Stream Monitoring:

A. Chemical

The South Branch of Saxtons River shall be sampled at approved locations upstream and downstream of the fields used for land application and analyzed for the following:

<u>Parameter</u>	<u>Units</u>	<u>Type</u>	<u>Sample Frequency</u>
Total Phosphorus	mg/L	grab	August and September
Total Dissolved Phosphorus	mg/L	grab	August and September
Chloride	mg/L	grab	August and September
Sodium	mg/L	grab	August and September
Total Kjeldahl Nitrogen (TKN)	mg/L	grab	August and September
Ammonia Nitrogen	mg/L	grab	August and September
Nitrite-Nitrate Nitrogen	mg/L	grab	August and September
pH	S.U.	grab	August and September
Temperature	Deg.	grab	August and September
Total Alkalinity as CaCO <sub>3</sub>	mg/L	grab	August and September
Dissolved Oxygen	mg/L	grab	August and September
Turbidity	N.T.U.	grab	August and September
Conductivity	S/m	grab	August and September

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 The permittee shall not sample the receiving stream within 24 hours of any storm event affecting the stream's watershed.

B. Biological:

If the Secretary determines it is necessary, the permittee shall, upon written notice from the Secretary, have qualified aquatic biologist perform a biological site assessment(s) and/or biological sampling and analysis of the receiving stream(s) in accordance with an approved biological sampling plan.

E6. Submittal of Monitoring Results:

The results of all the whey, washwater, groundwater and surface water sampling required by Conditions E3 - E5 above shall be submitted to the Secretary by the 15th day of the second month following the date of sampling.

E7. Soil Sampling:

Upon written notification from the Secretary, the permittee shall submit a soil sampling plan to the Secretary for review and approval for the collection and analysis of soil samples from the fields utilized for land application.

E8. Toxic Scan Analysis:

In July or August, 2020, the permittee shall have a toxic scan analysis performed on representative samples of washwater from the Grafton facility. The washwater shall be collected and analyzed for the presence of the toxic contaminants in Table 1 of the Vermont Hazardous Waste Management Regulations utilizing the Toxicity Characteristic Leaching Procedure (TCLP). The samples shall also be analyzed for the presence of priority pollutants including volatile organic compounds, semi-volatile organic compounds, pesticides, herbicides and metals. In addition, the chromatograms generated by the laboratory shall be reviewed by a qualified consultant to determine the presence/absence of other compounds in addition to those tested for.

By September 30, 2020, the permittee shall submit to the Secretary the results of the toxic scan analyses and a report by the consulting firm retained to review the data and chromatographs.

E9. Water Quality Evaluation:

By September 30, 2020, the permittee shall have a qualified water quality specialist submit a water quality evaluation to the Secretary of all the whey, washwater, groundwater and surface water quality data collected during the 2016 – 2020 permit period. Biological monitoring data, if requested by the Secretary, shall also be included. The report shall also include a summary of the volume of whey and washwater applied to the fields prior to groundwater and/or surface water sampling.

The water quality evaluation shall indicate whether the land application of process wastewater is in compliance with the Groundwater Protection Rule and Strategy and the Vermont Water Quality Standards.

E10. Sampling and Testing Procedures:

All whey, washwater and groundwater sampling, preservation, handling and test procedures used to comply with the monitoring requirements herein shall conform to procedures specified in the most current edition of Standard Methods for the Examination of Water and Wastewater APHA - AWWA - WPCF, and the Vermont Water Quality Standards unless written approval of an alternate method is received from the Agency.

E11. Miscellaneous:

If the permittee monitors any required parameter set forth in this permit for this treatment and disposal system more frequently or at additional locations outside the treatment facilities than required by this permit, the results of such monitoring shall be submitted by the 15th day of the second month following the date of sampling.

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years or longer if requested by the Secretary. Records shall include laboratory bench sheets showing exact location, time and composites of sample as well as analytical procedures used, interim results obtained and all calculations supporting the reported test results.

## **SECTION F - "COMPLIANCE REVIEW"**

If the results of monitoring the whey, washwater, groundwater or receiving streams show there is a possibility that the Groundwater Protection Rule and Strategy or the Vermont Water Quality Standards may be exceeded, the Secretary may increase the frequency of, or change the location of monitoring of groundwater or surface water. If continued monitoring and analysis indicates that a violation of the whey and washwater disposal limits, or a violation of the Groundwater Protection Rule and Strategy or the Vermont Water Quality Standards has occurred, is occurring, or is likely to occur, the Secretary may require the permittee to take appropriate corrective actions to eliminate or reduce the possibility of a violation.

The issuance of this Indirect Discharge Permit, ID-9-0055, to the Grafton Village Cheese Company by the Secretary relies upon the data, designs, judgement and other information supplied by the applicant, the applicant's consultants and other experts who have participated in the preparation of the application. The Secretary makes no assurance that this disposal system will meet the performance objectives of the applicant and no warranties or guarantees are given or implied.

**SECTION G - "EFFECTIVE DATE"**

This Indirect Discharge Permit, ID-9-0055, issued to the Grafton Village Cheese Company for the land application of non-sewage dairy processing waste from the Grafton Village Cheese Company facilities in Grafton and Brattleboro, Vermont becomes effective this \_\_\_\_\_ day of July, 2016.

Alyssa B. Schuren, Commissioner  
Department of Environmental Conservation

By \_\_\_\_\_ **DRAFT** \_\_\_\_\_  
Bryan Redmond, Director  
Drinking Water and Groundwater Protection Division