

5/20/08



State of Ohio Environmental Protection Agency

Southwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 27, 2008

Mr. Keith Brisbin
Hilltop Meats
9964 Crosby Road
Cincinnati, Ohio 45030

Re: Hamilton County, Hilltop Meats, NPDES Permit Violations

Dear Mr. Brisbin:

We have reviewed your Monthly Operating Reports (MORs) covering the months of September 2007 through May 2008 for the referenced facility. Our review indicates violations of the conditions of your NPDES Permit (NPDES Permit # OH0134112; OEPA Permit # 11H00024*AD). The specific instances of noncompliance and deficiencies were as follows:

Effluent Violations for September 2007 through May 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
September 2007	CBOD5	Monthly	mg/l	10	276
September 2007	CBOD5	Monthly	kg/day	0.038	0.10
September 2007	TSS	Monthly	mg/l	12	564
September 2007	TSS	Monthly	kg/day	0.045	0.21
September 2007	Ammonia	Monthly	mg/l	1.0	83
September 2007	Ammonia	Monthly	kg/day	0.0038	0.030
September 2007	CBOD5	Weekly	mg/l	15	276
September 2007	CBOD5	Weekly	kg/day	0.057	0.10
September 2007	TSS	Weekly	mg/l	18	564
September 2007	TSS	Weekly	kg/day	0.068	0.21
September 2007	Ammonia	Weekly	mg/l	1.5	83
September 2007	Ammonia	Weekly	kg/day	0.0057	0.030
September 2007	Oil & Grease	Daily	mg/l	10	11
September 2007	Fecal Coliform	Monthly	#/100ml	1000	"AK"
September 2007	Fecal Coliform	Weekly	#/100ml	2000	"AK"
October 2007	TSS	Monthly	mg/l	12	102
October 2007	TSS	Weekly	mg/l	18	102
October 2007	Ammonia	Monthly	mg/l	1.0	162
October 2007	Ammonia	Weekly	mg/l	1.5	162



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Effluent Violations for September 2007 through May 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
October 2007	CBOD5	Weekly	mg/l	15	231
October 2007	DO	Daily	mg/l	6.0	1.5
October 2007	Oil & Grease	Daily	mg/l	10	13
October 2007	Fecal Coliform	Monthly	#/100ml	1000	"AK"
October 2007	Fecal Coliform	Weekly	#/100ml	2000	"AK"
November 2007	TSS	Monthly	mg/l	12	1392.
November 2007	TSS	Monthly	kg/day	0.045	1.0
November 2007	Ammonia	Monthly	mg/l	3.0	250
November 2007	Ammonia	Monthly	kg/day	0.011	0.19
November 2007	CBOD5	Monthly	mg/l	10	1350
November 2007	CBOD5	Monthly	kg/day	0.038	1.0
November 2007	TSS	Weekly	mg/l	18	1392
November 2007	TSS	Weekly	kg/day	0.068	1.0
November 2007	Ammonia	Weekly	mg/l	4.5	250
November 2007	Ammonia	Weekly	kg/day	0.017	0.19
November 2007	CBOD5	Weekly	mg/l	15	1350
November 2007	CBOD5	Weekly	kg/day	0.057	1.0
November 2007	DO	Daily	mg/l	6.0	2.0
November 2007	Oil & Grease	Daily	mg/l	10	44
December 2007	CBOD5	Monthly	mg/l	10	558
December 2007	CBOD5	Weekly	mg/l	15	558
December 2007	CBOD5	Monthly	kg/day	0.038	0.76
December 2007	CBOD5	Weekly	kg/day	0.057	0.76
December 2007	TSS	Monthly	mg/l	12	280
December 2007	TSS	Weekly	mg/l	18	280
December 2007	TSS	Monthly	kg/day	0.045	0.38
December 2007	TSS	Weekly	kg/day	0.068	0.38
December 2007	Ammonia	Monthly	mg/l	3.0	107
December 2007	Ammonia	Weekly	mg/l	4.5	107
December 2007	Ammonia	Monthly	kg/day	0.011	0.15
December 2007	Ammonia	Weekly	kg/day	0.017	0.15
December 2007	pH	Daily	S.U.	6.5	5.9
December 2007	DO	Daily	mg/l	6.0	4.4
February 2008	TSS	Monthly	mg/l	12	208
February 2008	TSS	Monthly	kg/day	0.045	0.22
February 2008	Ammonia	Monthly	mg/l	3.0	61
February 2008	Ammonia	Monthly	kg/day	0.011	0.065



Effluent Violations for September 2007 through May 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
February 2008	CBOD5	Monthly	mg/l	10	270
February 2008	CBOD5	Monthly	kg/day	0.038	0.29
February 2008	TSS	Weekly	mg/l	18	208
February 2008	TSS	Weekly	kg/day	0.068	0.22
February 2008	Ammonia	Weekly	mg/l	4.5	61
February 2008	Ammonia	Weekly	kg/day	0.017	0.065
February 2008	CBOD5	Weekly	mg/l	15	270
February 2008	CBOD5	Weekly	kg/day	0.057	0.29
February 2008	pH	Daily	S.U.	6.5	6.4
March 2008	TSS	Monthly	mg/l	12	388
March 2008	TSS	Monthly	kg/day	0.045	0.34
March 2008	Ammonia	Monthly	mg/l	3.0	90
March 2008	Ammonia	Monthly	kg/day	0.011	0.079
March 2008	CBOD5	Monthly	mg/l	10	264
March 2008	CBOD5	Monthly	kg/day	0.038	0.23
March 2008	TSS	Weekly	mg/l	18	388
March 2008	TSS	Weekly	kg/day	0.068	0.34
March 2008	Ammonia	Weekly	mg/l	4.5	90
March 2008	Ammonia	Weekly	kg/day	0.017	0.079
March 2008	CBOD5	Weekly	mg/l	15	264
March 2008	CBOD5	Weekly	kg/day	0.057	0.23
March 2008	DO	Daily	mg/l	6.0	3.1
March 2008	Oil & Grease	Daily	mg/l	10	35
April 2008	TSS	Monthly	mg/l	12	318
April 2008	TSS	Monthly	kg/day	0.045	0.29
April 2008	Ammonia	Monthly	mg/l	3.0	120
April 2008	Ammonia	Monthly	kg/day	0.011	0.11
April 2008	CBOD5	Monthly	mg/l	10	860
April 2008	CBOD5	Monthly	kg/day	0.038	0.78
April 2008	TSS	Weekly	mg/l	18	318
April 2008	TSS	Weekly	kg/day	0.068	0.29
April 2008	Ammonia	Weekly	mg/l	4.5	120
April 2008	Ammonia	Weekly	kg/day	0.017	0.11
April 2008	CBOD5	Weekly	mg/l	15	860
April 2008	CBOD5	Weekly	kg/day	0.057	0.78
April 2008	DO	Daily	mg/l	6.0	2.6
April 2008	Oil & Grease	Daily	mg/l	10	11



Effluent Violations for September 2007 through May 2008

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
May 2008	TSS	Monthly	mg/l	12	14250
May 2008	TSS	Monthly	kg/day	0.045	11
May 2008	Ammonia	Monthly	mg/l	1.0	122
May 2008	Ammonia	Monthly	kg/day	0.0038	0.097
May 2008	CBOD5	Monthly	mg/l	10	2010
May 2008	CBOD5	Monthly	kg/day	0.038	1.5
May 2008	TSS	Weekly	mg/l	18	14250
May 2008	TSS	Weekly	kg/day	0.068	11
May 2008	Ammonia	Weekly	mg/l	1.5	122
May 2008	Ammonia	Weekly	kg/day	0.0057	0.097
May 2008	CBOD5	Weekly	mg/l	15	2010
May 2008	CBOD5	Weekly	kg/day	0.057	1.6
May 2008	DO	Daily	mg/l	6.0	0.9
May 2008	Oil & Grease	Daily	mg/l	10	11
May 2008	Fecal Coliform	Monthly	#/100ml	1000	"AK"
May 2008	Fecal Coliform	Weekly	#/100ml	2000	"AK"

Numerous monitoring violations were also noted for odor, color and turbidity. Hilltop Meats must monitor and report the effluent discharge in accordance to the NPDES Permit.

Finally, Hilltop Meats is required to upgrade the WWTP in accordance to the NPDES Permit as detailed in Part I.C titled "Schedule of Compliance." This schedule requires a Permit to Install application be submitted by June 1, 2005; construction be started by December 1, 2005; construction be completed by May 1, 2006; and final compliance be achieved by June 1, 2006. At this time, Hilltop Meats has failed to comply with these requirements.

Please be advised that failure to comply with the effluent limitations or to satisfy the reporting requirements of your NPDES Permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

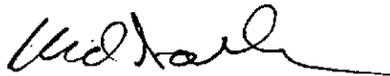
We have received your reports addressing the reasons for the above violations and the actions being taken to prevent further occurrences. Your explanation is not satisfactory and we request, within ten days of receipt of this letter, written information as to what additional steps you take to prevent further occurrences. Future violations must continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."



Mr. Keith Brisbin
June 27, 2008
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If you have any questions regarding the above, please contact me at (937) 285-6096.

Sincerely,

A handwritten signature in black ink, appearing to read "Ned Sarle". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ned Sarle
Division of Surface Water
Permit Section

cc: Andy Griner, Winelco, Inc.



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