



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korfeski, Director

July 7, 2010

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

Re: Hamilton County, Hilltop Meats, Compliance Evaluation Inspection
Notice of Violation

Dear Mr. Brisbin:

On June 30, 2010, I conducted a Compliance Evaluation Inspection at the Hilltop Meats facility (NPDES Permit No. OH0134112; OEPA Permit No. 11H00024*AD). Representing this facility was Greg Ross, Steve Ratcliff and you. A copy of my inspection report is enclosed.

The inspection report contains two unsatisfactory areas. The Effluent / Receiving Waters section was rated unsatisfactory as a result of the NPDES Permit violations. The Compliance Schedule section was rated unsatisfactory as a result of the failure to complete upgrades of the wastewater treatment plant in accordance with the schedule in the NPDES Permit.

The numerous NPDES Permit limit violations must be eliminated immediately. Until these violations are eliminated, the Ohio EPA will not be able to renew your NPDES Permit. Until it is renewed, Hilltop Meats will be required to comply with the expired NPDES Permit. In addition, the Ohio EPA will consider enforcement action to address the noted NPDES Permit limit violations unless Hilltop Meats is able to eliminate these violations in a timely manner.

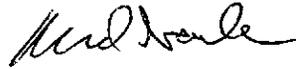
Based on inspection observations and our discussions during the inspection it appears highly likely that the disinfectants used by Hilltop Meats are destroying any chance of successfully operating the wastewater treatment plant. Hilltop Meats needs to investigate options for either pretreating the wastestream carrying the disinfectants before it enters the treatment plant or find alternate ways of accomplishing the necessary disinfection within Hilltop Meats.

The areas noted in the report summary will require a written response by August 6, 2010. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions. Status updates should also be provided with all future noncompliance notifications.

Mr. Keith Brisbin
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If you have any questions, please call me at (937) 285 - 6096.

Sincerely,



Ned Sarle
Division of Surface Water
Permits Section

Enclosure

ec: Greg Ross, Winelco, Inc.



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11H00024*AD	OH0134112	6/30/2010	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Hilltop Meats 9964 Crosby Road Harrison, Ohio 45030	9:40 A.M.	6/1/2004
	Exit Time	Permit Expiration Date
	10:45 A.M.	5/31/2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Keith Brisbin, Owner	(513) 738-1901	
Greg Ross, Winelco	(513) 755-8050	
Steve Ratcliff, Winelco	(513) 755-8050	
Name, Address and Title of Responsible Official	Phone Number	
Keith Brisbin, Owner 9964 Crosby Road Harrison, Ohio 45030	(513) 738-1901	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	U	Compliance Schedule
S	Operations & Maintenance	U	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal	N	Other
S	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)	
See Attached Summary of Findings / Comments.	
Inspector	Reviewer
<i>Ned Sarle</i> 7/7/10	<i>Martyn G Burt</i> 7/7/10
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Permit #: 11H00024*AD
NPDES #: OH0134112

Summary of Findings / Comments

Areas Requiring a Response

A review of the Discharge Monitoring Reports (DMRs) indicated numerous NPDES Permit violations. A listing of the violations for January 2009 through April 2010 is indicated on Attachment I. Significant violations have also occurred in May and June, 2010. Action must be taken immediately to address the effluent violations. Future violations must also be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The solids in the septic tank were noted as being white and appeared to be dead. Excessive sewage odors were also noted next to the recirculating sand filters. The tops of these filters were black and appear to be septic.

Winelco has grabbed two influent samples when monitoring the WWTP effluent. The first sample showed an approximate 74% reduction in CBOD5. However, the second sample showed no reduction at all. It appears that biological treatment is not occurring at the WWTP. The disinfectants being used at the meat preparation area appear to be preventing any biological treatment from occurring at the WWTP. Please provide a copy of the MSDS sheets for all products discharged to the WWTP. Hilltop Meats must also consider switching to another disinfectant that may not be as harmful to the WWTP operations.

The influent WWTP loads are also very high. These high loads will make operating the WWTP more difficult. Hilltop Meats should review the products used at the facility and the facility operations to determine if these influent loads could be reduced. If not, additional pretreatment may be necessary.

Finally, the DMRs are required to be submitted electronically by the 20th of each following month. The May 2010 DMR has not been submitted at this time. This report must be submitted immediately. Future DMRs must also be submitted in a timely manner.

Areas Not Requiring a Response

The Hilltop Meats treatment plant was required to be upgraded as required by the NPDES Permit in Part I, Section C titled "Schedule of Compliance." Final compliance was required to be achieved by June 1, 2006. The WWTP upgrade was completed on April 9, 2010. The treatment system consists of a grease trap, two 1250 gallon septic tanks, a 1500 gallon recirculation tank, four recirculating sand filters and an ultraviolet disinfection system.

The grease trap is pumped once every three months. Saving Liquid Waste is contracted to pump the grease trap. The septic tanks will be checked periodically and pumped as needed. Winelco will pump the septic tanks.

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The WWTP flow rate is monitored using an elapse time meter on the drinking water well. The treatment plant is designed for an average daily flow rate of 1000 gpd. A review of the MORs for the noted period indicated that the average and peak flow rates were 301 gpd and 1227 gpd.

Attachment I

Effluent Limit Violations for January 2009 through April 2010

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
January 2009	CBOD5	Monthly	mg/l	10	653
January 2009	CBOD5	Monthly	kg/day	0.038	1.7
January 2009	Ammonia	Monthly	mg/l	3.0	69
January 2009	Ammonia	Monthly	kg/day	0.011	0.17
January 2009	TSS	Monthly	mg/l	12	620
January 2009	TSS	Monthly	kg/day	0.045	1.6
January 2009	CBOD5	Weekly	mg/l	15	653
January 2009	CBOD5	Weekly	kg/day	0.057	1.7
January 2009	DO	Daily	mg/l	6.0	5.9
January 2009	Ammonia	Weekly	mg/l	4.5	69
January 2009	Ammonia	Weekly	kg/day	0.017	0.17
January 2009	Oil & Grease	Daily	mg/l	10	11
January 2009	TSS	Weekly	mg/l	18	620
January 2009	TSS	Weekly	kg/day	0.068	1.6
February 2009	CBOD5	Monthly	mg/l	10	780
February 2009	CBOD5	Monthly	kg/day	0.038	0.99
February 2009	Ammonia	Monthly	mg/l	3.0	33
February 2009	Ammonia	Monthly	kg/day	0.011	0.041
February 2009	TSS	Monthly	mg/l	12	1640
February 2009	TSS	Monthly	kg/day	0.045	2.1
February 2009	CBOD5	Weekly	mg/l	15	780
February 2009	CBOD5	Weekly	kg/day	0.057	0.99
February 2009	Ammonia	Weekly	mg/l	4.5	33
February 2009	Ammonia	Weekly	kg/day	0.017	0.041
February 2009	TSS	Weekly	mg/l	18	1640
February 2009	TSS	Weekly	kg/day	0.068	2.1
February 2009	DO	Daily	mg/l	6.0	5.2
March 2009	CBOD5	Monthly	mg/l	10	255
March 2009	CBOD5	Monthly	kg/day	0.038	0.22
March 2009	Ammonia	Monthly	mg/l	3.0	150
March 2009	Ammonia	Monthly	kg/day	0.011	0.13
March 2009	TSS	Monthly	mg/l	12	1200
March 2009	TSS	Monthly	kg/day	0.045	1.0
March 2009	CBOD5	Weekly	mg/l	15	255
March 2009	CBOD5	Weekly	kg/day	0.057	0.22
March 2009	Ammonia	Weekly	mg/l	4.5	150
March 2009	Ammonia	Weekly	kg/day	0.017	0.13
March 2009	TSS	Weekly	mg/l	18	1200

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Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
March 2009	TSS	Weekly	kg/day	0.068	1.0
March 2009	DO	Daily	mg/l	6.0	3.0
April 2009	CBOD5	Monthly	mg/l	10	1290
April 2009	CBOD5	Monthly	kg/day	0.038	2.8
April 2009	Ammonia	Monthly	mg/l	3.0	1000
April 2009	Ammonia	Monthly	kg/day	0.011	2.2
April 2009	TSS	Monthly	mg/l	12	57
April 2009	TSS	Monthly	kg/day	0.045	0.12
April 2009	CBOD5	Weekly	mg/l	15	1290
April 2009	CBOD5	Weekly	kg/day	0.057	2.8
April 2009	Ammonia	Weekly	mg/l	4.5	1000
April 2009	Ammonia	Weekly	kg/day	0.017	2.2
April 2009	TSS	Weekly	mg/l	18	57
April 2009	TSS	Weekly	kg/day	0.068	0.12
April 2009	DO	Daily	mg/l	6.0	0.2
April 2009	Oil & Grease	Daily	mg/l	10	17
May 2009	CBOD5	Monthly	mg/l	10	1140
May 2009	CBOD5	Monthly	kg/day	0.038	2.0
May 2009	Ammonia	Monthly	mg/l	1.0	168
May 2009	Ammonia	Monthly	kg/day	0.0038	0.29
May 2009	TSS	Monthly	mg/l	12	15700
May 2009	TSS	Monthly	kg/day	0.045	27
May 2009	CBOD5	Weekly	mg/l	15	1140
May 2009	CBOD5	Weekly	kg/day	0.057	2.0
May 2009	Ammonia	Weekly	mg/l	1.5	168
May 2009	Ammonia	Weekly	kg/day	0.0057	0.29
May 2009	TSS	Weekly	mg/l	18	15700
May 2009	TSS	Weekly	kg/day	0.068	27
May 2009	DO	Daily	mg/l	6.0	0.1
May 2009	Fecal Coliform	Monthly	#/100ml	1000	"AK"
May 2009	Fecal Coliform	Weekly	#/100ml	2000	"AK"
June 2009	CBOD5	Monthly	mg/l	10	282
June 2009	CBOD5	Monthly	kg/day	0.038	0.22
June 2009	Ammonia	Monthly	mg/l	1.0	92
June 2009	Ammonia	Monthly	kg/day	0.0038	0.074
June 2009	TSS	Monthly	mg/l	12	282
June 2009	TSS	Monthly	kg/day	0.045	0.23
June 2009	DO	Daily	mg/l	6.0	1.0

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Effluent Limit Violations for January 2009 through April 2010

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
June 2009	Fecal Coliform	Monthly	#/100ml	1000	"AK"
June 2009	Fecal Coliform	Weekly	#/100ml	2000	"AK"
July 2009	CBOD5	Monthly	mg/l	10	570
July 2009	CBOD5	Monthly	kg/day	0.038	0.23
July 2009	Ammonia	Monthly	mg/l	1.0	51
July 2009	Ammonia	Monthly	kg/day	0.0038	0.020
July 2009	TSS	Monthly	mg/l	12	560
July 2009	TSS	Monthly	kg/day	0.045	0.22
July 2009	CBOD5	Weekly	mg/l	15	570
July 2009	CBOD5	Weekly	kg/day	0.057	0.23
July 2009	Ammonia	Weekly	mg/l	1.5	51
July 2009	Ammonia	Weekly	kg/day	0.0057	0.020
July 2009	TSS	Weekly	mg/l	18	560
July 2009	TSS	Weekly	kg/day	0.068	0.22
July 2009	DO	Daily	mg/l	6.0	0.8
July 2009	Fecal Coliform	Monthly	#/100ml	1000	"AK"
July 2009	Fecal Coliform	Weekly	#/100ml	2000	"AK"
September 2009	CBOD5	Monthly	mg/l	10	468
September 2009	CBOD5	Monthly	kg/day	0.038	0.11
September 2009	Ammonia	Monthly	mg/l	1.0	9960
September 2009	Ammonia	Monthly	kg/day	0.0038	2.5
September 2009	TSS	Monthly	mg/l	12	1220
September 2009	TSS	Monthly	kg/day	0.045	0.30
September 2009	CBOD5	Weekly	mg/l	15	468
September 2009	CBOD5	Weekly	kg/day	0.057	0.11
September 2009	DO	Daily	mg/l	6.0	2.2
September 2009	Ammonia	Weekly	mg/l	1.5	9960
September 2009	Ammonia	Weekly	kg/day	0.0057	2.5
September 2009	TSS	Weekly	mg/l	18	1220
September 2009	TSS	Weekly	kg/day	0.068	0.30
September 2009	Fecal Coliform	Monthly	#/100ml	1000	"AK"
September 2009	Fecal Coliform	Weekly	#/100ml	2000	"AK"
October 2009	CBOD5	Monthly	mg/l	10	492
October 2009	CBOD5	Monthly	kg/day	0.038	0.49
October 2009	Fecal Coliform	Monthly	#/100ml	1000	20000
October 2009	Ammonia	Monthly	mg/l	1.0	155
October 2009	Ammonia	Monthly	kg/day	0.0038	0.15
October 2009	TSS	Monthly	mg/l	12	2090

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Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
October 2009	TSS	Monthly	kg/day	0.045	2.07
October 2009	CBOD5	Weekly	mg/l	15	492
October 2009	CBOD5	Weekly	kg/day	0.057	0.49
October 2009	Fecal Coliform	Weekly	#/100ml	2000	20000
October 2009	Ammonia	Weekly	mg/l	1.5	155
October 2009	Ammonia	Weekly	kg/day	0.0057	0.15
October 2009	TSS	Weekly	mg/l	18	2090
October 2009	TSS	Weekly	kg/day	0.068	2.1
October 2009	DO	Daily	mg/l	6.0	0.7
November 2009	CBOD5	Monthly	mg/l	10	516
November 2009	CBOD5	Monthly	kg/day	0.038	0.51
November 2009	Ammonia	Monthly	mg/l	3.0	135
November 2009	Ammonia	Monthly	kg/day	0.011	0.13
November 2009	TSS	Monthly	mg/l	12	790
November 2009	TSS	Monthly	kg/day	0.045	0.78
November 2009	CBOD5	Weekly	mg/l	15	516
November 2009	CBOD5	Weekly	kg/day	0.057	0.51
November 2009	Ammonia	Weekly	mg/l	4.5	135
November 2009	Ammonia	Weekly	kg/day	0.017	0.13
November 2009	TSS	Weekly	mg/l	18	790
November 2009	TSS	Weekly	kg/day	0.068	0.78
November 2009	DO	Daily	mg/l	6.0	1.8
November 2009	Oil & Grease	Daily	mg/l	10	57
November 2009	pH	Daily	S,U.	6.5	5.7
December 2009	CBOD5	Monthly	mg/l	10	540
December 2009	CBOD5	Monthly	kg/day	0.038	0.25
December 2009	Ammonia	Monthly	mg/l	3.0	53
December 2009	Ammonia	Monthly	kg/day	0.011	0.024
December 2009	TSS	Monthly	mg/l	12	21
December 2009	CBOD5	Weekly	mg/l	15	540
December 2009	CBOD5	Weekly	kg/day	0.057	0.25
December 2009	Ammonia	Weekly	mg/l	4.5	53
December 2009	Ammonia	Weekly	kg/day	0.017	0.024
December 2009	TSS	Weekly	mg/l	18	21
December 2009	DO	Daily	mg/l	6.0	1.0
December 2009	Oil & Grease	Daily	mg/l	10	375
April 2010	CBOD5	Monthly	mg/l	10	330
April 2010	CBOD5	Monthly	kg/day	0.038	0.40

Permit #: 11H00024*AD
NPDES #: OH0134112

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Effluent Limit Violations for January 2009 through April 2010

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
April 2010	Ammonia	Monthly	mg/l	3.0	97
April 2010	Ammonia	Monthly	kg/day	0.011	0.12
April 2010	TSS	Monthly	mg/l	12	80
April 2010	TSS	Monthly	kg/day	0.045	0.097
April 2010	CBOD5	Weekly	mg/l	15	330
April 2010	CBOD5	Weekly	kg/day	0.057	0.40
April 2010	Ammonia	Weekly	mg/l	4.5	97
April 2010	Ammonia	Weekly	kg/day	0.017	0.12
April 2010	TSS	Weekly	mg/l	18	80
April 2010	TSS	Weekly	kg/day	0.068	0.097
April 2010	DO	Daily	mg/l	6.0	2.7