



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

September 7, 2011

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

Re: Hamilton County, Hilltop Meats, Compliance Evaluation Inspection

Dear Mr. Brisbin:

On August 30, 2011, I conducted a Compliance Evaluation Inspection at the Hilltop Meats facility (NPDES Permit No. OH0134112; OEPA Permit No. 1IH00024*AD). Representing this facility was Eric Gibson 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 numerous NPDES Permit violations. The Compliance Schedule section was rated unsatisfactory as a result of the failure to complete the WWTP upgrades in accordance with the NPDES Permit.

As indicated during the inspection, the numerous effluent violations are unacceptable. These violations are occurring due to toxic discharges to the WWTP. The source of this toxicity continues to be the quaternary ammonia disinfectant and the hand sanitizer. In the next three months, you must eliminate all toxic sources in your facility and achieve significant progress towards complying with your NPDES Permit limits. If the toxic sources cannot be eliminated and significant progress achieved with complying with your NPDES Permit limits by December 1, 2011, you should start hauling wastewater from your facility.

The areas noted in the report summary will require a written response by September 28, 2011. 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
September 7, 2011
Page 2

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Ned Sarle".

Ned Sarle
Division of Surface Water
Permits Section

Enclosure

cc: Eric Gibson, Winelco, Inc.



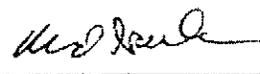
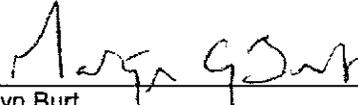
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1H00024*AD	OH0134112	8/30/2011	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	9:30 A.M.	6/1/2004
	Exit Time	Permit Expiration Date
	11:10 A.M.	5/31/2009
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Keith Brisbin, Owner Eric Gibson, Winelco	(513) 738-1901 (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
 Ned Sarte Permit Section Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
9/7/11 Date	9/7/11 Date

Permit #: 1IH00024*AD
NPDES #: OH0134112

Summary of Findings / Comments

Areas Requiring a Response

A review of the Discharge Monitoring Reports (DMRs) for November 2010 through June 2011 indicated numerous NPDES Permit violations. These violations are listed on Attachment I. Action must be taken immediately to eliminate the effluent violations. Future violations must also continue to be reported as required by the NPDES Permit as detailed in Part III.12 titled "Noncompliance Notification."

The biological treatment at the WWTP is still being wiped out all of the time. In the past, the quaternary ammonia and antibacterial soap have been noted as likely sources of this. At this time, the quaternary ammonia solution is used once every week or two, and the antibacterial soap is used daily. As in the past, we have recommended that you completely stop using these products. Otherwise, you will continue to kill your WWTP. You indicated that you would stop using these products and start using Clorox bleach and a liquid soap. With the Clorox bleach, the chlorine may also become a problem for the WWTP. The chlorine residual should be monitored in the septic tank to determine if it is becoming a problem for the WWTP.

Winelco has noted that the wastewater effluent has had a low pH. For the past year, the effluent pH has ranged from 6.1 to 7.2 S.U. The low pH may impact the wastewater treatment. The source of the low pH may be the caustic cleaner used for the smoke house. To address this low pH, soda ash has been added to the drain in this area. Winelco has also started to aerate the first septic tank compartment. These changes were started two to three weeks ago. Wastewater is now ponding on the surface of the recirculating sand filters when in the past they did not pond. The recirculating sand filters will not work properly with wastewater ponding on them. Please indicate what process changes will be made to address the ponding issue and to clean these filters.

Finally, as indicated during the inspection, the numerous effluent violations that have been occurring since 2006 are completely unacceptable. These violations are occurring due to toxic discharges to the WWTP. The sources of this past toxicity appear to be the quaternary ammonia disinfectant and the hand sanitizer. In the next three months, you must eliminate all toxic sources in your facility and comply with your NPDES Permit limits. If, by December 1, 2011, the toxic sources cannot be completely eliminated and significant progress made toward complying with your NPDES Permit, the wastewater should be hauled from the site.

The recirculating sand filter valves were noted as leaking. This prevents the sand filter from being taken offline and allowed to dry out. These leaking valves must be replaced.

Permit #: 1IH00024*AD

NPDES #: OH0134112

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 influent WWTP loads are 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.

The grease trap is pumped once every month. Saving Liquid Waste is contracted to pump the grease trap. The septic tanks are checked periodically and pumped by Winelco as needed.

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 DMRs for the noted period indicated that the average and peak flow rates were 276 gpd and 860 gpd.

Permit #: 1IH00024*AD
 NPDES #: OH0134112

Attachment I
 Effluent Limit Violations for November 2010 through June 2011

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
November 2010	CBOD5	Monthly	mg/l	10	3360
November 2010	CBOD5	Monthly	kg/day	0.038	4.3
November 2010	Ammonia	Monthly	mg/l	3.0	268
November 2010	Ammonia	Monthly	kg/day	0.011	0.34
November 2010	TSS	Monthly	mg/l	12	327
November 2010	TSS	Monthly	kg/day	0.045	0.41
November 2010	CBOD5	Weekly	mg/l	15	3360
November 2010	CBOD5	Weekly	kg/day	0.057	4.3
November 2010	Ammonia	Weekly	mg/l	4.5	268
November 2010	Ammonia	Weekly	kg/day	0.017	0.34
November 2010	TSS	Weekly	mg/l	18	327
November 2010	TSS	Weekly	kg/day	0.068	0.42
November 2010	DO	Daily	mg/l	6.0	1.7
November 2010	pH	Daily	mg/l	6.5	6.1
December 2010	CBOD5	Monthly	mg/l	10	276
December 2010	CBOD5	Monthly	kg/day	0.038	0.44
December 2010	Ammonia	Monthly	mg/l	3.0	118
December 2010	Ammonia	Monthly	kg/day	0.011	0.19
December 2010	TSS	Monthly	mg/l	12	172
December 2010	TSS	Monthly	kg/day	0.045	0.27
December 2010	CBOD5	Weekly	mg/l	15	276
December 2010	CBOD5	Weekly	kg/day	0.057	0.44
December 2010	Ammonia	Weekly	mg/l	4.5	118
December 2010	Ammonia	Weekly	kg/day	0.017	0.19
December 2010	TSS	Weekly	mg/l	18	172
December 2010	TSS	Weekly	kg/day	0.068	0.27
December 2010	DO	Daily	mg/l	6.0	2.5
December 2010	pH	Daily	mg/l	6.5	6.4
January 2011	CBOD5	Monthly	mg/l	10	920
January 2011	CBOD5	Monthly	kg/day	0.038	0.83
January 2011	Ammonia	Monthly	mg/l	3.0	198
January 2011	Ammonia	Monthly	kg/day	0.011	0.18
January 2011	TSS	Monthly	mg/l	12	170
January 2011	TSS	Monthly	kg/day	0.045	0.15
January 2011	CBOD5	Weekly	mg/l	15	920
January 2011	CBOD5	Weekly	kg/day	0.057	0.83
January 2011	Ammonia	Weekly	mg/l	4.5	198
January 2011	Ammonia	Weekly	kg/day	0.017	0.18
January 2011	TSS	Weekly	mg/l	18	170

Permit #: 1IH00024*AD

NPDES #: OH0134112

Attachment I
Effluent Limit Violations for November 2010 through June 2011

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
January 2011	TSS	Weekly	kg/day	0.068	0.15
January 2011	DO	Daily	mg/l	6.0	4.8
January 2011	pH	Daily	mg/l	6.5	6.2
February 2011	CBOD5	Monthly	mg/l	10	552
February 2011	CBOD5	Monthly	kg/day	0.038	0.56
February 2011	Ammonia	Monthly	mg/l	3.0	232
February 2011	Ammonia	Monthly	kg/day	0.011	0.24
February 2011	TSS	Monthly	mg/l	12	130
February 2011	TSS	Monthly	kg/day	0.045	0.13
February 2011	CBOD5	Weekly	mg/l	15	552
February 2011	CBOD5	Weekly	kg/day	0.057	0.56
February 2011	DO	Daily	mg/l	6.0	5.3
February 2011	Ammonia	Weekly	mg/l	4.5	232
February 2011	Ammonia	Weekly	kg/day	0.017	0.24
February 2011	TSS	Weekly	mg/l	18	130
February 2011	TSS	Weekly	kg/day	0.068	0.13
March 2011	CBOD5	Monthly	mg/l	10	522
March 2011	CBOD5	Monthly	kg/day	0.038	0.56
March 2011	Ammonia	Monthly	mg/l	3.0	192
March 2011	Ammonia	Monthly	kg/day	0.011	0.21
March 2011	TSS	Monthly	mg/l	12	126
March 2011	TSS	Monthly	kg/day	0.045	0.13
March 2011	CBOD5	Weekly	mg/l	15	522
March 2011	CBOD5	Weekly	kg/day	0.057	0.56
March 2011	DO	Daily	mg/l	6.0	3.1
March 2011	Ammonia	Weekly	mg/l	4.5	192
March 2011	Ammonia	Weekly	kg/day	0.017	0.21
March 2011	TSS	Weekly	mg/l	18	126
March 2011	TSS	Weekly	kg/day	0.068	0.13
April 2011	CBOD5	Monthly	mg/l	10	270
April 2011	CBOD5	Monthly	kg/day	0.038	0.22
April 2011	Ammonia	Monthly	mg/l	3.0	264
April 2011	Ammonia	Monthly	kg/day	0.011	0.22
April 2011	TSS	Monthly	mg/l	12	189
April 2011	TSS	Monthly	kg/day	0.045	0.16
April 2011	CBOD5	Weekly	mg/l	15	270
April 2011	CBOD5	Weekly	kg/day	0.057	0.22
April 2011	Ammonia	Weekly	mg/l	4.5	264
April 2011	Ammonia	Weekly	kg/day	0.017	0.22

Permit #: 1IH00024*AD
 NPDES #: OH0134112

Attachment I
 Effluent Limit Violations for November 2010 through June 2011

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
April 2011	TSS	Weekly	mg/l	18	189
April 2011	TSS	Weekly	kg/day	0.068	0.16
April 2011	DO	Daily	mg/l	6.0	3.3
May 2011	TSS	Monthly	mg/l	12	270
May 2011	TSS	Monthly	kg/day	0.045	0.35
May 2011	Ammonia	Monthly	mg/l	1.0	264
May 2011	Ammonia	Monthly	kg/day	0.0038	0.34
May 2011	Fecal Coliform	Monthly	mg/l	1000	5100
May 2011	CBOD5	Monthly	mg/l	10	1560
May 2011	CBOD5	Monthly	kg/day	0.038	2.0
May 2011	TSS	weekly	mg/l	18	270
May 2011	TSS	weekly	kg/day	0.068	0.35
May 2011	Ammonia	weekly	mg/l	1.5	264
May 2011	Ammonia	weekly	kg/day	0.0057	0.34
May 2011	Fecal Coliform	weekly	mg/l	2000	5100
May 2011	CBOD5	weekly	mg/l	15	1560
May 2011	CBOD5	weekly	kg/day	0.057	2.0
May 2011	DO	Daily	mg/l	6.0	3.3
June 2011	CBOD5	Monthly	mg/l	10	228
June 2011	CBOD5	Monthly	kg/day	0.038	0.21
June 2011	Ammonia	Monthly	mg/l	1.0	274
June 2011	Ammonia	Monthly	kg/day	0.0038	0.25
June 2011	TSS	Monthly	mg/l	12	90
June 2011	TSS	Monthly	kg/day	0.045	0.083
June 2011	CBOD5	Weekly	mg/l	15	228
June 2011	CBOD5	Weekly	kg/day	0.057	0.21
June 2011	Ammonia	Weekly	mg/l	1.5	274
June 2011	Ammonia	Weekly	kg/day	0.0057	0.25
June 2011	TSS	Weekly	mg/l	18	90
June 2011	TSS	Weekly	kg/day	0.068	0.083
June 2011	DO	Daily	mg/l	6.0	3.2
June 2010	Fecal Coliform	Monthly	#/100ml	1000	"AK"
June 2010	Fecal Coliform	Weekly	#/100ml	2000	"AK"