



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

October 10, 2012

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

RE: Hamilton County, Hilltop Meats, Compliance Evaluation Inspection

Dear Mr. Brisbin:

On September 28, 2012, I conducted a Compliance Evaluation Inspection at the Hilltop Meats facility (NPDES Permit No. OH0134112; OEPA Permit No. 11H00024*AD). Representing this facility was Eric Lynch, Greg Ross and you. A copy of my inspection report is enclosed.

The inspection report contains three unsatisfactory areas. The Effluent/Receiving Waters section was rated unsatisfactory as a result of the numerous NPDES Permit violations. The Records/Reports section was rated unsatisfactory as a result of the late submittal of numerous Discharging Monitoring Reports. The Compliance Schedule section was rated unsatisfactory as a result of the failure to complete the WWTP upgrades in accordance with the Director's Final Findings and Orders (DFFOs).

The Hilltop Meats treatment plant was to be upgraded as required by the DFFOs issued effective on May 11, 2012. Hilltop Meats was ordered to comply with their NPDES Permit by July 1, 2012. In the event final compliance could not be achieved by July 1, 2012, the facility was required to submit, by August 1, 2012 a Permit to Install (PTI) application for converting the existing treatment system to a holding tank. The necessary construction was required to be started by September 1, 2012, and be completed by September 15, 2012.

Based on the reported flows and the reported grease trap pump out frequencies, it seems that the WWTP must have been discharging at least sporadically since July 2012, and the wastewater results would not have complied with the NPDES Permit limits. Therefore, the facility should have applied for a PTI to convert the treatment system to a holding tank and should have completed the construction of this holding tank. As a result, the facility is in violation of the DFFOs. Action must be taken immediately to submit this holding tank PTI application and for constructing the

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necessary modifications to the current treatment system. Finally, please note that once the system has been converted to a holding tank, the expired NPDES permit should be revoked and all discharges to waters of the state must cease.

The areas noted in the report summary will require a written response by October 26, 2012. The response should include a description of the actions proposed to correct the violations and the dates anticipated for completion of these actions.

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

Sincerely,



Ned Sarle
Environmental Specialist
Division of Surface Water
Permits Section

NS/ff

Enclosure

ec: Eric Lynch, 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
1IH00024*AD	OH0134112	9/28/2012	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	10:00 A.M.	6/1/2004
	Exit Time	Permit Expiration Date
	11:35 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, Inc.	(513) 439-0145	
Eric Lynch, Winelco, Inc.	(513) 222-8845	
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
U	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> 10/10/12	<i>Martyn Burt</i> 10/11/12
Ned Sarle Permit Section Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

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Summary of Findings/Comments

Areas Requiring a Response

A review of the Discharge Monitoring Reports (DMRs) for January through August 2012 indicated numerous NPDES permit violations. These violations are listed on Attachment I. Future violations must continue to be reported as required by the NPDES permit as detailed in Part III.12 titled "Noncompliance Notification."

The DMRs for January, February, March, April, June and August 2012 were also noted as being submitted late. These reports are required to be submitted by the 20th of each following month. The NPDES permit addresses this requirement in Part III, Section 4 titled "Reporting". Hilltop Meats must ensure all future DMRs are submitted in a timely manner.

The facility has not reported a discharge since February 9, 2012. On the day of the inspection, Winelco was finally able to see a discharge from the treatment system and was able to sample it. The collected wastewater sample looked cloudy and appeared highly unlikely to comply with the NPDES permit limits. A copy of these sample results must be provided to this office as soon as they become available.

The sanitary wastewater goes directly to the treatment system while the process wastewater goes to two grease traps prior to the treatment system. Winelco originally pumped the whole WWTP and reseeded it in early February 2012. For March through early July 2012, the facility pumped the two grease traps once every 10 days. In July 2012, the facility reduced the pumping to twice a month. Based on this information, the treatment system has discharged on some occasions since at least May 2012. For May, June and July 2012, wastewater samples were grabbed from the recirculation tank prior to potentially being discharged. The wastewater results were the best during the July 2012 sampling event. However, even these results would have still resulted in a TSS violation.

The Hilltop Meats treatment plant was to be upgraded as required by the DFFOs issued effective on May 11, 2012. Hilltop Meats was ordered to comply with their NPDES permit limits by July 1, 2012. In the event final compliance could not be achieved by July 1, 2012, the facility was required to submit by August 1, 2012 a Permit to Install (PTI) application for converting the treatment system to a holding tank. The necessary construction was required to be started by September 1, 2012 and be completed by September 15, 2012.

Based on the fact that the WWTP was discharging in July 2012, and the wastewater results would not have complied with the NPDES permit limits, the facility should have applied for a PTI to convert the treatment system to a holding tank and should have completed the construction of this holding tank. As a result, the facility is in violation of the DFFOs. Action must be taken immediately to submit this holding tank PTI

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application and for constructing the necessary modifications to the current treatment system. Once this construction has been completed, the expired NPDES permit should be revoked.

Saving Liquid Waste is contracted to pump the grease traps. Records documenting their pumping of the grease traps for 2012 must be provided.

Areas Not Requiring a Response

The treatment system consists of a 300 gallon grease trap, a 1,400 gallon grease trap, two 1,250 gallon septic tanks, a 1,500 gallon recirculation tank, four recirculating sand filters and an ultraviolet disinfection system. The 1,400 gallon grease trap was approved on March 9, 2012 and was installed shortly thereafter.

In the past, the biological treatment was noted as being periodically being killed. At this time, the quaternary ammonia cleaning solution is used weekly, and the antibacterial soap is routinely used.

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 1,000 gpd. A review of the DMRs for the noted period indicated that the average and peak flow rates were 231gpd and 561 gpd.

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Attachment I

Hilltop Meats

Effluent Limit Violations for January through July 2012

Reporting Period	Parameter	Limit Type	Units	Permit Limit	Reported Value
January 2012	TSS	Monthly	mg/l	12	116
January 2012	TSS	Monthly	kg/day	0.045	0.23
January 2012	Ammonia	Monthly	mg/l	3.0	248
January 2012	Ammonia	Monthly	kg/day	0.011	0.49
January 2012	CBOD5	Monthly	mg/l	10	276
January 2012	CBOD5	Monthly	kg/day	0.038	0.55
January 2012	TSS	Weekly	mg/l	18	116
January 2012	TSS	Weekly	kg/day	0.068	0.23
January 2012	Ammonia	Weekly	mg/l	4.5	248
January 2012	Ammonia	Weekly	kg/day	0.017	0.49
January 2012	CBOD5	Weekly	mg/l	15	276
January 2012	CBOD5	Weekly	kg/day	0.057	0.55
January 2012	DO	Daily	mg/l	6.0	5.2