



**Environmental
Protection Agency**

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



1IG0000320081007

HAMILTON PETER CREMER NORTH AMERICA LP

PIEKUTOWSKI, MA 2008/10/07



State of Ohio Environmental Protection Agency
Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249
www.epa.state.oh.us

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

October 6, 2008

Mr. David Hiltz
Peter Cremer North America LP
3117 Southside Avenue
Cincinnati, Ohio 45204

Re: Peter Cremer NA South Terminal – OH0010120;1IG00003*ID – RI

NOTICE OF VIOLATION

Dear Mr. Hiltz:

On September 6, 2008, Marianne Piekutowski of this office met with Mike Doll of your staff and conducted a Reconnaissance Inspection (RI) as a follow up to the December 17, 2007 meeting regarding the reporting issues in the facility's self-monitoring reports. Please note that the report, by its format, tends to highlight negative areas.

As indicated in the attached RI report, the only area that was evaluated was the "Self-Monitoring Reports". This received a rating of Unsatisfactory because of the on-going frequency violations. Additional details on this rating are provided in the attached report.

If you would have any questions regarding this inspection, please contact Ms. Piekutowski at this office at 937.285.6108.

Sincerely,

Martyn G. Burt
Environmental Supervisor
Division of Surface Water

Enclosures

Cc: Mike Doll, PCNA
Danny Norton, PCNA
Bob Hearn, BHE







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
1IG00003*ID	OH0010120	9/6/2008	R	S	11

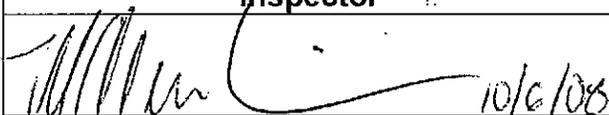
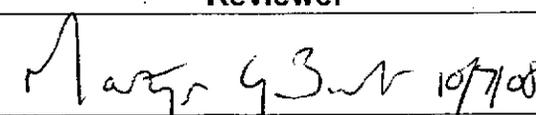
Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Peter Cremer North America LP South Terminal 3117 Southside Avenue Cincinnati, Ohio 45204	1:00pm	4/1/2006
	Exit Time	Permit Expiration Date
	2:30pm	3/31/2011
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Mike Doll, Plant Manager	513.557.4212	
Name, Address and Title of Responsible Official	Phone Number	
David A Hiltz, Director of Operations Peter Cremer North America LP 3117 Southside Avenue Cincinnati, Ohio 45204	513.557.4241	

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

Section D: Summary of Findings (Attach additional sheets if necessary)

The facility was rated as Unsatisfactory for Self-Monitoring Reports because the facility is not reporting as required. Flow must be reported as required. This is not being done. There have also been violations of the facility's permit limitations. This has been going on for some time. In December 2007, Ohio EPA met with the facility to review reporting requirements. The facility has not changed the way it is reporting. It is imperative that the facility submit correct self-monitoring reports. This report will also serve as the Notice of Violation.

Additional information is provided on the following pages.

Inspector	Reviewer
	
Marianne Piekutowski Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
Date: 10/6/08	Date: 10/7/08



EFFLUENT LIMIT VIOLATIONS

Station No. 1IG00003001

Parameter	Code	Date	Reported	Units	Permit Limit
Oil & Grease	00550	07/08	45	mg/L	15 mg/L (Ave)
Oil & Grease	00550	07/25/08	45	mg/L	20 mg/L (D)
pH	00400	07/25/08	5.9	SU	6.5 SU
Oil & Grease	00550	08/08	330	mg/L	15 mg/L (Ave)
pH	00400	08/15/08	5.7	SU	6.5 SU
Oil & Grease	00550	08/15/08	330	mg/L	20 mg/L (D)

In addition to these limit violations, the following frequency violations were noted:

Month	Parameter	# of Reported /# Required
January 2008	Flow Rate	0/31
January 2008	pH	0/1
January 2008	Total Precipitation	0/1
February 2008	Total Precipitation	0/1
February 2008	Flow Rate	0/29
March 2008	Total Precipitation	0/1
March 2008	Flow Rate	0/31
April 2008	Total Precipitation	0/1
April 2008	Flow Rate	0/30
May 2008	Total Precipitation	0/1
May 2008	Flow Rate	0/31
July 2008	Total Precipitation	0/1
July 2008	Flow Rate	0/31
August 2008	Total Precipitation	0/1
August 2008	Flow Rate	0/31

Station No. 1IG00003002

Parameter	Code	Date	Reported	Units	Permit Limit
Oil & Grease	00550	02/08	21	mg/L	15 mg/L (Ave)
Oil & Grease	00550	02/15/08	21	mg/L	20 mg/L (D)
pH	00400	07/25/08	5.5	SU	6.5 SU
Oil & Grease	00550	08/08	37	mg/L	15 mg/L (Ave)
pH	00400	08/15/08	6.1	SU	6.5 SU
Oil & Grease	00550	08/15/08	37	mg/L	20 mg/L (D)



Permit # : 11G00003*ID
NPDES #: OH0010120

In addition to these limit violations, the following frequency violations were noted:

Month	Parameter	# of Reported /# Required
January 2008	Total Precipitation	0/1
January 2008	pH	0/1
January 2008	Flow Rate	0/1
February 2008	Flow Rate	0/1
February 2008	Total Precipitation	0/1
March 2008	Total Precipitation	0/1
March 2008	Flow Rate	0/1
April 2008	Total Precipitation	0/1
April 2008	Flow Rate	0/1
May 2008	Total Precipitation	0/1
May 2008	Flow Rate	0/1
July 2008	Total Precipitation	0/1
July 2008	Flow Rate	0/1
August 2008	Total Precipitation	0/1
August 2008	Flow Rate	0/1

The facility is working with BHE to address its flow monitoring issues and discharge violations. However, the facility must submit an update of the steps being taken to address these violations. This must be submitted within ten (10) days of receipt of this notice.

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



11