



**Environmental  
Protection Agency**

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



**\*1IG0000320091210\***

HAMILTON PETER CREMER NORTH AMERICA LP

PIEKUTOWSKI, MA 2009/12/10



State of Ohio Environmental Protection Agency  
Southwest District

401 East Fifth Street  
Dayton, Ohio 45402-2911

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

December 10, 2009

Mr: Andy Aylwin  
Peter Cremer North America LP  
6117 Southside Avenue  
Cincinnati, Ohio 45204

Re: **Peter Cremer North America – OH0010120;1IG00003\*ID – CEI**  
**Notice of Violation**

Dear Mr. Aylwin:

On November 19, 2009, Marianne Piekutowski of this office met with Mike Doll to conduct a NPDES Compliance Evaluation Inspection at the Peter Cremer NA South Terminal facility on Southside Avenue in Hamilton County. The purpose of the inspection was to evaluate the compliance with the terms of the NPDES permit. Please note that the report, by its format, tends to highlight negative areas.

As indicated on the attached NPDES Compliance Inspection Report, all areas except for Effluent/Receiving Waters received a satisfactory rating. Effluent/Receiving Waters received a marginal rating because of the pH and Oil and Grease violations at the facility.

Thank you for the time extended during the inspection. If you would have any questions, please contact Ms. Piekutowski at this office at 937.285.6108.

Sincerely,

Martyn G. Butt  
Environmental Supervisor  
Division of Surface Water

Enclosures

Cc: Mike Doll, PCNA  
Jamie Heimkreiter, PCNA





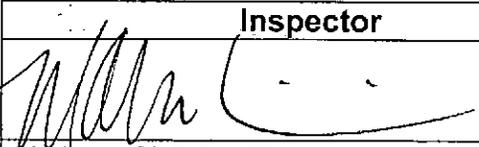
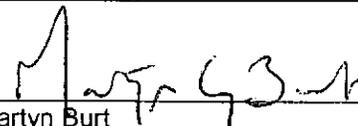
State of Ohio Environmental Protection Agency  
Southwest District Office

### NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IG00003*ID	OH001920	11/19/2009	C	S	2

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	10:30 am	4/1/2006
	Exit Time	Permit Expiration Date
	12:00 pm	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	
Andy Aylwin, President Peter Cremer North America LP 3117 Southside Avenue Cincinnati, Ohio 45204	513.557.4205	

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

Section D: Summary of Findings (Attach additional sheets if necessary)	
See attached report.	
Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
12/10/09 Date	12/11/09 Date

Permit # : 1IG00003\*ID  
NPDES # : OH001920

Sections E thru K: Complete on all inspections as appropriate  
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

**Section E: Permit Verification**

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee ..... Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... NA
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

(i) Outfall 003 is storm water only from the concrete area under the pipe run. There is no discharge other than the storm water that falls onto the concrete. Any material would be from a pipe leak or break.

**Section F: Permit Verification**

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... NA

Comments/Status:

(a) There have also been a number of pH and Oil and Grease violations. These will be addressed in this inspection report. The reporting violations noted in past inspections have been resolved.

**Section G: Operation & Maintenance**

**Treatment Works:**

Treatment facility properly operated and maintained

- (a) Standby power available.....generator  or dual feed ..... NA
- (b) Adequate alarm system available for power or equipment failures.. NA
- (c) All treatment units in service other than backup units..... NA
- (d) Operator holds unexpired license of class required by permit..... NA  
Class: I
- (f) Routine and preventative maintenance schedule/performed  
on time..... Y
- (g) Any major equipment breakdown since last inspection..... NA
- (h) Operation and maintenance manual provided and maintained..... NA
- (i) Any plant bypasses since last inspection..... Y
- (j) Regulatory agency notified of bypasses..... Y  
On MORs  and/or Spill Hotline (1-800-282-9378) X
- (k) Any hydraulic and/or organic overloads since last inspection..... N

**Collection System:**

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... NA  
(CSO  and/or SSO )
- (c) Regulatory agency notified of overflows (SSOs)..... NA
- (d) CSO O&M plan provided and implemented..... NA
- (e) CSOs monitored and reported in accordance with permit..... NA
- (f) Portable pumps used to relieve system..... NA
- (g) Lift station alarms provided and maintained..... NA
- (h) Are lift stations equipped with permanent standby power  
or equivalent..... NA
- (i) Is there an inflow/infiltration problem (separate sewer system),  
or were there any major repairs to collection system since  
last inspection..... NA
- (j) Any complaints received since last inspection of basement flooding NA
- (k) Are any portions of the sewer system at or near capacity..... NA

Comments/Status:

**Section H: Sludge Management**

- (a) Sludge management plan (SMP)  
Submitted date:                      Approval #:                      Not submitted     N/A X
- (b) Sludge management plan current..... NA  
(c) Sludge adequately disposed..... NA  
    (Method:                      )  
(d) If sludge is incinerated, where is ash disposed of  
(e) Is sludge disposal contracted..... NA  
    (Name:                      )  
(f) Has amount of sludge generated changed significantly since  
    last inspection..... NA  
(g) Adequate sludge storage provided at plant.....NA  
(h) Land application sites monitored and inspected per SMP..... NA  
(i) Records kept in accordance with State and Federal law..... NA  
(j) Any complaints received in last year regarding sludge..... NA  
(k) Is sludge adequately processed (digestion, pathogen control)..... NA

**Comments/Status:**

**Section I: Self-Monitoring Program**

**Flow Measurement:**

- (a) Primary flow measuring device operated and maintained..... Y  
Type of device: Ultrasonic & Parshall flume  Ultrasonic & Weir  Weir   
Calculated from influent  Other X(Specify: Estimated based on rainfall  
and area of facility.)  
(b) Calibration frequency adequate ..... NA  
    (Date of last calibration:                      )  
(c) Secondary instruments operated and maintained..... NA  
(d) Flow measurement equipment adequate to handle full range  
    of flows..... NA  
(e) Actual flow discharged is measured..... N  
(f) Flow measuring equipment inspection frequency  
    Daily Weekly monthly other

**Comments/Status:**

The flow from this facility is not constant. The facility usually only has flow when it rains. The flow rates are calculated using the amount of rainfall and the facility's surface area tributary to each of the outfalls. The facility is now collecting their own samples.

**Section I: Self-Monitoring Program (con't)**

**Sampling:**

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
  - (i) Samples refrigerated during compositing..... NA
  - (ii) Proper preservation techniques used..... Y
  - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

**Laboratory:**

*General*

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... NA
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... NA
- (e) Commercial laboratory used..... Y  
Parameters analyzed by commercial lab: TSS, O&G, BOD, COD

Lab name: Belmont Park

*Quality Control/Quality Assurance*

- (f) Quality assurance manual provided and maintained..... Y
  - (g) Satisfactory calibration and maintenance of instruments/equipment. Y
  - (h) Adequate records maintained..... Y
  - (i) Results of latest USEPA quality assurance performance sampling program:  Satisfactory  Marginal  Unsatisfactory
- Date: Do not participate in this program.

**Comments/Status:**

Sampling (d)(ii) – All of the samples are grab samples.  
General (e) - The pH is done in-house.

**Section J: Effluent/Receiving Water Observations**

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	NA	NA	NA	NA	NA	NA	NA
002	NA	NA	NA	NA	NA	NA	NA
003	NA	NA	NA	NA	NA	NA	NA

**Comments/Status:**

There was no discharge on the day of the inspection from any of these outfalls.

**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**

Changes have been made at the facility regarding washwaters and cleaning of the trench drains. Additional cleanings and hauling off of washwaters are now occurring.

Permit # : 1IG00003\*ID  
NPDES # : OH001920

**PETER CREMER NORTH AMERICA LP SOUTH TERMINAL  
NPDES COMPLIANCE EVALUATION INSPECTION  
DATE OF INSPECTION: November 19, 2009**

**ITEMS FOR DISCUSSION AT INSPECTION:**

The facility is having on-going Oil and Grease and pH violations. The number of these violations has been decreasing. The frequency violations noted in previous inspections have been eliminated.

**COMPLIANCE EVALUATION:**

**Outfall 1IG00003001**

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
pH	00400	10/17/2008	5.1	SU	6.5 (Min)
pH	00400	11/7/2008	5.9	SU	6.5(Min)

**Outfall 1IG00003002**

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
pH	00400	10/17/2008	4.99	SU	6.5(Min)
Oil & Grease	00550	10/2008	98	mg/L	15(Avg)
Oil & Grease	00550	10/17/2008	98	mg/L	20 (D)
pH	00400	11/7/2008	5.4	SU	6.5(Min)
Oil & Grease	00550	11/2008	27	mg/L	15(Avg)
Oil & Grease	00550	11/7/2008	27	mg/L	20 (D)
Oil & Grease	00550	12/2008	110	mg/L	15(Avg)
Oil & Grease	00550	12/19/2008	110	mg/L	20 (D)
pH	00400	3/13/2009	6.48	SU	6.5(Min)
pH	00400	6/5/2009	6.25	SU	6.5(Min)
Oil & Grease	00550	7/2009	15.115	mg/L	15(Avg)
Oil & Grease	00550	7/10/2009	24.9	mg/L	20 (D)
pH	00400	8/14/2009	6.22	SU	6.5(Min)

In addition, on January 30, 2009, there were code violations for all of the parameters at both outfalls 001 and 002. The "AF" code was used because the sampling stations were inundated by the Ohio River. The facility is on the banks of the river, and high flows affect the ability of the facility to discharge and sample.

Because of these violations, the facility received a marginal rating for the category of Effluent/Receiving Stream.

**PETER CREMER NORTH AMERICA LP COMPLIANCE EVALUATION INSPECTION –  
Page 2**

There have been significant improvements made in the submittal of the NPDES monitoring data. The frequency violations noted in previous inspections were eliminated. The magnitude of the discharge violations had been reduced.

**OBSERVATIONS:**

Peter Cremer North America loads and unloads barges into tanks for transport to manufacturers. There are two tank farms at the facility. One tank farm discharges to outfall 001 and the second discharges to outfall 002. The application has outfall 003 listed. This outfall consists of the concrete-lined ditch under the piping run for loading and unloading the barges. Any contamination in this area would be from leaking or ruptured pipes. If there is a rupture, then the facility's spill prevention plan would be executed. There is no drainage into this area from the tanks farms or the rest of the facility. The facility also has a flaking operation, but there is no discharge from this operation.

The wastewater being discharged from outfalls 001 and 002 is from steam condensate, floor washdowns, and storm water. Each of these outfalls has an oil/water separator that the flow goes through prior to being discharged to the Ohio River. At the time of the inspection, there was no discharge to the Ohio River. The oil/water separators were shut off. The material that is skimmed from the oil/water separators is a fatty acid/alcohol. It is sold to Resource Materials as a product. The material skimmed in the separators is now checked daily. The separators were pumped out last month. This is being done to reduce violations. The material from the bottom (solids) of the separator is taken to Rumpke. The tank washdowns no longer go to the oil/water separators. They are now hauled off-site for disposal. This goes to either SCS or United Waste Water Services. The sanitary flow from the site flows to a septic tank and leach lines. The water is from Cincinnati Water Works.

The facility would like to pursue discharging their wastewaters to MSD. At the present time, there are not sewers available. The company would be interested in hauling wastewater to MSD until a sewer connection would become available. PCNA's contact information has been passed along to MSD.

**REQUIRED ACTION**

Peter Cremer North America LP must continue to reduce the violations of its NPDES permit at the South Terminal. Great strides have been made in this effort, but the company must maintain its diligence in eliminating violations.