



**Environmental
Protection Agency**

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



1IG0000320101115

HAMILTON PETER CREMER NORTH AMERICA LP

PIEKUTOWSKI, MA 2010/11/15 ?

10/26/10?
wrong date?



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Lee Fisher, Lt. Governor
Chris Korleski, Director

October 26, 2010

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

**Re: Peter Cremer North America – OH0010120;1IG00003*ID – CEI/Pre-Permit
Notice of Violation**

Dear Mr. Aylwin:

On October 8, 2010, I met with Mike Doll to conduct a NPDES Pre-Permit/Compliance Evaluation Inspection (CEI) 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, and update the facility information for the NPDES permit renewal. 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 and Self-Monitoring received a satisfactory rating. Effluent/Receiving Waters received a marginal rating because of the pH and Oil and Grease violations at the facility. Self-Monitoring received a marginal rating because the chain-of-custody forms for Belmont Labs are incomplete.

Thank you for the time extended during the inspection. If you would have any questions, please me at 937.285.6108.

Sincerely,

Marianne Piekтуowski
Environmental Specialist 2
Division of Surface Water

Enclosures

Cc: Mike Doll, PCNA
Jamie Heimkreiter, PCNA





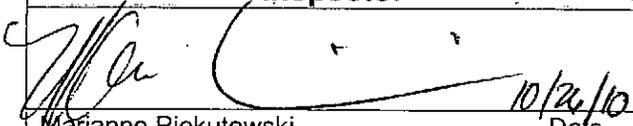
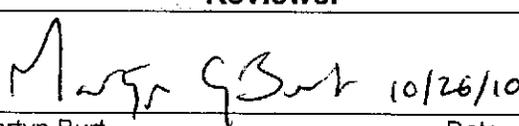
State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IG00003*ID	OH0010120	10/08/2010	C	S	1

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	10:15 am	4/1/2006
	Exit Time	Permit Expiration Date
	12:15 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	M	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)	
Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 10/26/10	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 10/26/10

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) Do Categorical Standards apply?...If yes, list applicable standards.. N

Not applicable
- (d) Product(s) and production rates conform with permit application (Industries)..... Y
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application... Y
- (g) All discharges are permitted..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... N
- (e) Compliance schedule contained in...N/A
- (f) Permittee is in compliance with schedule..... NA
- (g) Has biomonitoring shown toxicity in discharge since last inspection NA

Comments/Status:

The facility has had minor violations since the last inspection. However, the number of effluent violations as well as the number of frequency violations have been greatly reduced.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator or dual feed NA

i. What does the back-up power source operate.....

NA

ii. How often is the generator tested under load.....

NA

(b) Which components have an alarm system available for power or equipment failures.....

NA

(c) All treatment units in service other than backup units..... NA

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....

NA

(e) Any major equipment breakdown since last inspection..... NA

(f) Operation and maintenance manual provided and maintained..... NA

(g) Any plant bypasses since last inspection..... NA

(h) Any plant upsets since last inspection..... NA

Comments/Status:

There is one oil/water separator on outfall 001 and one oil/water separator on outfall 002. Weekly inspections are done of the units. The facility is looking at cleaning and pumping out the separators more frequently to see if that helps reduce violations.

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 NA Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

*if one of the selected methods is land application, complete applicable charts.
Class A - Exception Quality Sewage Sludge (monitoring station 584)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized Solids	Option 8 - >75% Percent Solids with Unstabilized Solids
Alternative 1 - Time and Temperature Regime (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 - Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Gamma ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 - Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Class B Sewage Sludge (monitoring station 581)

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 -38% Volatile Solids Reduction	Option 2 -Anaerobic Bench Scale Analysis	Option 3 - Aerobic Bench Scale Analysis	Option 4 - Specific Oxygen Uptake Rate	Option 5 - Aerobic Time and Temperature	Option 6 - Alkali Addition	Option 7 - >75% Percent Solids without Unstabilized	Option 8 - >75% Percent Solids with Unstabilized	Option 9 - Land Injection	Option 10 - Immediate Incorporation
Alternative 1 - Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 - Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 - Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (a) Has amount of sludge generated changed significantly since the last inspection..... NA
- (b) How much sludge storage is provided at the plant.....
- (c) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... NA
- (d) Any complaints received in last year regarding sludge..... NA
- (e) 5/8" screen at headworks for facilities that land apply sludge..... NA
- (f) Are sludge application sites inspected to verify compliance with NPDES permit..... NA
- (g) Is a contractor used for sludge disposal..... NA
 If so, what is the name of the contractor.....

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary/Secondary flow measuring devices operated and maintained..... NA
Type of device (e.g. weir with ultrasonic level sensor):

Estimated based on surface area and rainfall.
- (b) Calibration frequency adequate NA
(Date of last calibration: NA)
- (c) 24-hour recording instruments operated and maintained.....NA
- (d) Flow measurement equipment adequate to handle full range of flows..... Y
- (e) Actual flow discharged is measured..... N
- (f) Flow measuring equipment inspection frequency
Daily Weekly monthly other NA

Comments/Status:

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
(see GLC page)
- (d) 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

Comments/Status:

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

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable..... Y
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval has been obtained..... NA
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... NA
- (g) Satisfactory calibration and maintenance of instruments/equipment. (see score from GLC page) Y
- (h) Commercial laboratory used..... Y
 Parameters analyzed by commercial lab: BOD, O&G, TSS, COD

Lab name: Belmont Labs

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling..... N
 Date:
- (b) Were any parameters "Unsatisfactory"..... NE
- (c) Reasons for "Unsatisfactory" parameters.....

NA

Comments/Status:

Section J: Effluent/Receiving Water Observations

Outfall # 11G00003001

Outfall Description: Final effluent from the West oil/water separator. There was no discharge from the separator on the day of the inspection.

Receiving Stream: Ohio River

Receiving Stream Description: Bathing waters, PWS, AWS, IWS, WWH

Outfall # 11G00003002

Outfall Description: Final effluent from the East oil/water separator. There was no discharge from the separator on the day of the inspection.

Receiving Stream: Ohio River

Receiving Stream Description: Bathing waters, PWS, AWS, IWS, WWH

Outfall # 11G00003003

Outfall Description: Final effluent from the concrete pad under the barge pipe run. There was no discharge from this area on the day of the inspection.

Receiving Stream: Ohio River

Receiving Stream Description: Bathing waters, PWS, AWS, IWS, WWH

Comments/Status:

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:

Permit # : 1IG00003*ID
NPDES # : OH0010120

General Lab Criteria

Criteria	Standard Methods Requirement		Acceptable?	Rating
Balance				NR
• Standard Weights	• Either NIST Class S or ASTM/ANSI Class 1 weights ^{1,2}	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Calibration verification required at least once each day the balance is used. ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Cleanliness, air movement, vibration	• Cleanliness of balance is a must and air movement and vibration needs to be kept to a minimum ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Service and recalibrate annually (manufacturer representative or comparable) ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Must be able to measure to 0.1 grams ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments :				
Criteria	Standard Methods Requirement		Acceptable?	Rating
Drying Oven (Suspended Solids)				NR
• Temperature Recordkeeping	• Temperature recorded with each use ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Log book maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2} . Correction factor posted on thermometer / equipment ¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Thermometer temperature accurate to 0.5° Celsius ⁵	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Acceptable temperature range is 103° – 105° F ⁴	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comments :				

● General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
pH Meter				
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Logbook maintained ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Minimum of 2 point calibration	• Calibration per manufacturer specification and calibration buffers must bracket anticipated result ⁷	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Slope Documentation / Acceptability	• Slope acceptable range indicated on benchsheet ²	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Buffer Expiration Date	• Buffers must not be expired	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Instrument manual available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing ⁸	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: : Daily calibration of pH meter. Control checks are done when there are large number of samples. A three point titration is done. The expiration dates are checked weekly.

Criteria	Standard Methods Requirement	Acceptable?		Rating
Dissolved Oxygen Meter				
• Calibration Method	• Air or known DO calibration method ¹⁰	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	• Calibration per manufacturer specification ¹⁰	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Calibration Frequency / Documentation	• Logbook maintained ²	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Calibration verification required at least once each day the meter is used. ³	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
• Other	• Small to no bubble present under membrane (must be smaller than the lead in number 2 pencil) ¹¹	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
Incubator (CBOD/ E-Coli)				
<ul style="list-style-type: none"> • Temperature Recordkeeping 	<ul style="list-style-type: none"> • Temperature checked / recorded twice daily for each shelf in use¹(E-Coli) 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	<ul style="list-style-type: none"> • Temperature checked / recorded daily² (CBOD) 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Acceptable temperature range (CBOD) is 20° C ±1.0 °¹² 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Acceptable temperature range (E-Coli) is 35° C ±0.5 °²² 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Logbook maintained² 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Temperature Calibration / Documentation 	<ul style="list-style-type: none"> • Thermometer calibrated annually with NIST traceable thermometer^{1,2} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Temperature correction information posted on incubator¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • E-Coli can use multiple tubes (five 20 ml or ten 10 ml), or mfg's multi-well tray 	<ul style="list-style-type: none"> • E-coli Ultraviolet lamp (365 nm wave length, 6 W bulb)²³ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Other 	<ul style="list-style-type: none"> • Instrument manual available 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Temperature Log (thermometer accurate to 0.5 Celsius).¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments: :

Criteria	Standard Methods Requirement	Acceptable?		Rating
Refrigerator				
<ul style="list-style-type: none"> • Temperature Recordkeeping 	<ul style="list-style-type: none"> • Temperature Log (thermometer accurate to 0.5 Celsius).⁵ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
<ul style="list-style-type: none"> • Temperature Calibration / Documentation 	<ul style="list-style-type: none"> • Thermometer calibrated annually with NIST traceable thermometer^{1,2} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Other 	<ul style="list-style-type: none"> • Thermometer held in water bath.¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Refrigerator temperature ≤6° Celsius.¹³ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Do not store volatile solvents, food, or beverages.¹⁴ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

General Lab Criteria

Criteria	Standard Methods Requirement		Rating
Chlorine Meter			NR
• Calibration Frequency / Documentation	• pH / millivolt meter read to 0.1 mV ¹⁵	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Calibration Method	• Calibration using three iodate solutions 0.2, 1.0, 5.0 milliliters or calibration per manufacturer specification ¹⁶	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Slope Documentation / Acceptability	• Calibration curve (acceptable slope)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book being maintained. ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Comments: :			
Criteria	Standard Methods Requirement		Rating
Ammonia Meter			NR
• Calibration Frequency / Documentation	• Calibration verification required for testing over long period of time (e.g. 12 hrs.), or after a large number of samples (every 10 samples) ³	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Slope acceptability	• Verify calibration slope is acceptable (per mfg. spec.).	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Calibration Method	• Standards used for calibration (3 ammonia solutions of 10 mg/l, 1 mg/l, and 0.1 mg/l) or per mfg. spec. ¹⁷	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Standards used for calibration not expired	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Other	• Electrode free of deposits and foreign material	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Teflon covered magnetic stirrer or equivalent for mixing ¹⁸	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Instrument manual available	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Comments: :			

General Lab Criteria

Criteria	Standard Methods Requirement		Rating
Sample Collection/Handling	Acceptable?		NR
• Sample Labeling	• Samples container labeled (description, date, time, preservative added, initialed). ¹⁹	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Chain of Custody	• Chain of custody (description, date, time, signature). ¹⁹	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
• Other	• Composite samples refrigerated during sample collection ¹⁴	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Equipment blanks utilized ¹⁴	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• SOP for cleaning of sampling equipment	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Logbook being maintained ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments: Only take grab samples. Do not have any composite samples.
A chain-of-custody request is kept and maintained.

Criteria	Standard Methods Requirement		Rating
Desiccator	Acceptable?		NR
• General criteria	• Properly working seals.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Desiccant fresh (blue color)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
• Documentation	• Log book being maintained ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments:

Criteria	Standard Methods Requirement		Rating
Bench sheets	Acceptable?		NR
• General criteria	• Date(s) ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Analyst initials ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Blue or black ink pen ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Calibration information ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Equations, calculations, units for all measurements, notations, and results present ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Corrections, single line through, initialed and dated ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Comments:

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?		Rating
Hot Water Bath (Fecal Coliform/E. Coli)				
<ul style="list-style-type: none"> • Temperature Recordkeeping 	<ul style="list-style-type: none"> • Temperature Log (thermometer accurate to 0.2° C)²¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	<ul style="list-style-type: none"> • Incubator temperature 44.5° C ± 0.2°^{21/24} 			
<ul style="list-style-type: none"> • Temperature Calibration / Documentation 	<ul style="list-style-type: none"> • Thermometer calibrated annually with NIST traceable thermometer^{1,2} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Log book being maintained² 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Water Level 	<ul style="list-style-type: none"> • Thermometer total immersion or partial (line on thermometer to ID immersion depth)^{1,5} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

Criteria	Standard Methods Requirement	Acceptable?		Rating
Autoclaves/Steam Sterilizers				
<ul style="list-style-type: none"> • All apparatus utilized is adequately sterilized before use 	<ul style="list-style-type: none"> • Sterilizing temperature 121° C²⁵ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	NR
	<ul style="list-style-type: none"> • 10 to 30 minutes time based on material being sterilized²⁶ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Documentation 	<ul style="list-style-type: none"> • Verify the autoclave temperature weekly by using a maximum registering thermometer (MRT) to confirm that 121°C has been reached as measured in the exhaust.¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Date, contents, sterilization time and temperature, total time in autoclave, and analyst's initials should be recorded each time the autoclave is used¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Temperature Calibration / Documentation 	<ul style="list-style-type: none"> • Thermometer calibrated annually with NIST traceable thermometer^{1,2} 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	<ul style="list-style-type: none"> • Log book being maintained² 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
<ul style="list-style-type: none"> • Performance Checks 	<ul style="list-style-type: none"> • Test monthly for efficacy using a biological such as commercially available <i>Geobacillus stearothermophilus</i> in spore strips, suspensions, or capsules¹ 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Comments:

General Lab Criteria

Criteria	Standard Methods Requirement	Acceptable?	Rating
Final Effluent Temperature Monitoring			
• General Criteria	• Thermometer calibrated annually with NIST traceable thermometer ^{1,2}	<input type="checkbox"/> Yes <input type="checkbox"/> No	NR
	• Thermometer accurate to 0.1° Celsius ⁵	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	• Log book being maintained ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Comments:			
Number of Criteria Rated:			
			Acceptable -
			Marginal -
			Unacceptable -
			Total Number of Areas Rated 0
<p>Acceptable Ratings – No action required (recommend SOP's written or updated, perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, written response not required).</p>			
<p>Marginal Ratings – Improvements required, written response required (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response).</p>			
<p>Unsatisfactory Rating - Improvements required, written response required, NOV issued (recommend SOP's be written or updated, recommend they perform DMRQA's for all onsite analysis, recommend voluntary lab analyst certification, require deficiencies to be addressed in written response to NOV).</p>			
Consider recommending PAI Audit from DES when:		>60% of ratings are Marginal >45% of ratings are a combination of Marginal or Unacceptable >30% of ratings are Unacceptable	

Notation of Referenced Method

- | | |
|----------------------------|------------------------------|
| 1 Method 9020-B, Item 3 | 14 Method 1060A, Item 1 |
| 2 Method 1020-A, Item 1 | 15 Method 4500-CI I, Item 2 |
| 3 Method 1020-B, Item 10 | 16 Method 4500-CI I, Item 4 |
| 4 Method 2540-B, Item 2 | 17 Method 4500-NH3 D, Item 4 |
| 5 Method 2550-B, Item 1 | 18 Method 4500-NH3 D, Item 2 |
| 6 Method 1020-A, Item 1 | 19 Method 1060-B, Item 2 |
| 7 Method 4500-H B, Item 4 | 20 Method 1060-B, Item 1 |
| 8 Method 4500-H B, Item 2 | 21 Method 9222D, Item 1 |
| 9 Method 1020-B, Item 2 | 22 Method 9223 B, Item 2 |
| 10 Method 4500-O B, Item 3 | 23 Method 9223 B, Item 3 |
| 11 Method 4500-O G, Item 3 | 24 Method 1603, Item 2 |
| 12 Method 5210-B, Item 5 | 25 Method 9030-B, Item 3 |
| 13 CFR 136.3, Table II | 26 Method 9020 B, Table IV |

Equipment Logbook Content - all maintenance performed on a piece of equipment should be documented in the logbook. This should include parts replacement and routine maintenance activities. Entries should include date, maintenance performed and initials of person making entry.

General Lab Criteria

Preservation and Holding Times

Parameter	Container	Min. Sample Size (mL)	Sample Type	Preservation	Maximum Storage Time	
					Recommended	Regulatory
BOD / CBOD	P, G	1000	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	6h	48h
TSS	P, G	200	G, C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 d
pH	P, G	50	G	Analyze immediately	0.25h	0.25 h
NH ₃ -N	P, G	500	G, C	Analyze as soon as possible or add H ₂ SO ₄ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	28 d
TRC	P, G	500	G	Analyze immediately	0.25h	0.25 h
DO (electrode)	G, BOD Bottle	300	G	Analyze immediately	0.25h	0.25 h
Temperature	P, G	--	G	Analyze immediately	0.25h	0.25 h
Metals, general	P, G	1000	G, C	For dissolved filter immediately and add HNO ₃ to pH <2	6 months	6 months
Purgeables by purge and trap	G (PTFE lined lid)	40 (X2)	G	HCl to pH<2, Refrigerate $\leq 6^{\circ}\text{C}$	7 d	14 d
Base/Neutrals and acids	G (solvent rinsed or baked)	1000	C, G	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Pesticides	G (PTFE lined lid)	1000	C	Refrigerate $\leq 6^{\circ}\text{C}$	7 d	7 days until extraction 40 days after extraction
Fecal Coliform / E-Coli	G, P (Sterilized)	100	G	Refrigerate $\leq 10^{\circ}\text{C}$ If chlorine present, add sodium thiosulfate tablet	6 hrs transport Start analysis within 2 hrs of receipt in lab.	
Oil and Grease	G	1000	G	HCl or H ₂ SO ₄ to pH <2, Refrigerate $\leq 6^{\circ}\text{C}$	28 d	28 d

Approved Standard Methods

CBOD / BOD 5 Day	Std Methods 5210-B
Ammonia, Selective Electrode Method	Std Methods 4500-NH ₃ D
Total Residual Chlorine, DPD Colorimetric Method	Std Methods 4500-Cl G
Total Suspended Solids, Dried at 103-105 °C	Std Methods 2540-D
Dissolved Oxygen, Membrane Electrode Method	Std Method 4500-O G
pH, Electrometric Method	Std Methods 4500-H+ B
Fecal Coliform, Membrane Filter Procedure	Std Methods 9222D
Escherichia Coli, Enzyme Substrate Test	Std Method 9223B
Escherichia Coli Membrane Filtration Procedure	EPA Method 1603
Oil and Grease	USEPA 1664A or Std Methods 5520B
Metals, general	USEPA 200, Std Methods 3111B or C, or 3120B
Volatiles (Purgeables by purge and trap)	USEPA 6210, Std Methods 624
Semi-Volatiles (Base/Neutrals and acids)	USEPA 6410, Std Methods 625
Pesticides	USEPA 6410 and 6630, Std Methods 608

**PETER CREMER NORTH AMERICA LP SOUTH TERMINAL
NPDES PRE-PERMIT/COMPLIANCE EVALUATION INSPECTION
DATE OF INSPECTION: October 8, 2010**

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. The facility has submitted its renewal application, but it is waiting to get sampling data back. There has not been a discharge to sample due to drought conditions.

COMPLIANCE EVALUATION:

Outfall 1IG00003001

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
Oil & Grease	00550	07/2010	19.5	mg/L	15 (Avg)
Oil & Grease	00550	08/2010	38.9	mg/L	15 (Avg)
Oil & Grease	00550	08/25/2010	38.9	mg/L	20 (D)
pH	00400	08/25/2010	5.99	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	11/6/2009	6.2	SU	6.5(Min)
pH	00400	05/26/2010	5.97	SU	6.5(Min)
pH	00400	08/25/2010	6.31	SU	6.5(Min)

In addition, on November 6, 2009 and May 26, 2010, the "AJ" code was used for BOD. This shows up as a code violation. The laboratory did not do any additional dilutions on the BOD sample. This was the code that closest fit the situation. The "AF" code was used because the sampling stations were frozen and/or 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. This code was used on the following days: December 11, 2009, January 1, 15, 31, 2010, February 12, 19, 2010, and March 15, 2010.

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

PETER CREMER NORTH AMERICA LP PRE-PERMIT/CEI – 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.

GENERAL LABORATORY CRITERIA

The facility does pH on-site and uses a contract laboratory for all other parameters in the NPDES permit. There are no composite samples collected. All of the facility's samples are grab samples for the discharge from the oil/water separators. The chain-of-custody forms for Belmont Labs are not being completed correctly. The following items must be included:

- 1) Sample type (Composite or Grab);
- 2) Preservation method;
- 3) Personnel collecting sample;
- 4) Parameter being analyzed for; and
- 5) Sample custody prior to being picked up by Belmont Labs.

Because of this, the facility received a rating of marginal for Self-Monitoring.

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 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 is proposing to pump out the

separators more frequently. The facility should consider using the pH as a guide for pumping out the separators when there are prolonged periods with little or no discharge. As the material sits in the separators, it can break down, and form a weak organic acid. This can occur when there is no rain, and the material sits in the sun. When the pH would get close the lower pH limit of 6.5 SU, then the material could be pumped. In addition, if there is no discharge from the separators during a month, then the eDMRs should be coded "AL" for no discharge during the month. If the facility is sampling material sitting in the separators that is not being discharged, then they may be giving themselves violations that are not really violations.

The facility is collecting drips, spills, etc associated with the loading and unloading of product in drip pans. This material is being collected in totes. The totes with liquids and solids are taken by United Wastewater Services.

The facility will be repaving the area tributary to outfall 002 on the east side of the property.

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.

Peter Cremer North America LP must submit is sampling data for the NPDES permit renewal as soon as a suitable rain event occurs.

Peter Cremer North America LP must complete its chain-of-custody forms to provide adequate sampling documentation. This must begin immediately.