



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

December 21, 2012

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

**RE: PETER CREMER NORTH AMERICA, OH0010120,1IG00003\*ID, RI  
NOTICE OF VIOLATION**

Dear Mr. Aylwin:

On December 19, 2012, I met with Mike Doll, Sarah Keyes, Mike Haught and you to conduct a compliance meeting and Reconnaissance Inspection (RI) at the Peter Cremer NA South Terminal facility on Southside Avenue in Hamilton County. The purpose of the inspection was to discuss the non-compliance with the pH and Oil & Grease limits in its NPDES permit, and discuss the steps the Facility is taking to address the non-compliance.

**ITEMS FOR DISCUSSION AT INSPECTION:**

The Facility had four Oil and Grease and five pH violations since September 2010 at its two outfalls. The various steps being taken at the Facility need to be documented, and the future steps noted.

**COMPLIANCE EVALUATION:**

A compliance review was conducted for the Facility from September 1, 2010 through December 19, 2012. The following violations were noted:

**Outfall 1IG00003001**

<i>Parameter</i>	<i>Code</i>	<i>Date</i>	<i>Reported</i>	<i>Units</i>	<i>Permit Limit</i>
pH	00400	08/05/2011	6.39	SU	6.5(Min)
pH	00400	02/02/2012	6.31	SU	6.5(Min)
pH	00400	03/22/2012	6.02	SU	6.5(Min)
pH	00400	08/17/2012	5.75	SU	6.5(Min)

**Outfall 11G00003002**

<b><i>Parameter</i></b>	<b><i>Code</i></b>	<b><i>Date</i></b>	<b><i>Reported</i></b>	<b><i>Units</i></b>	<b><i>Permit Limit</i></b>
Oil & Grease	00550	01/2011	19.2	mg/L	15 (Avg)
Oil & Grease	00550	11/2011	15.7	mg/L	15 (Avg)
Oil & Grease	00550	12/2011	17.05	mg/L	15 (Avg)
Oil & Grease	00550	12/15/2011	21.2	mg/L	20 (D)
pH	00400	03/22/2012	6.02	SU	6.5(Min)

In addition, 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 3, 2010, February 23, 25, 28, 2011, March 31, 2011, April 30, 2011, and May 31, 2011.

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. Outfall 001 has not had a violation since March 22, 2012, and outfall 002 has not had a violation since August 17, 2012.

**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, 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 skimmed from the oil/water separators is a fatty acid/alcohol. The material skimmed in the separators is now checked daily, 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. The sanitary flow from the site flows to a septic tank and leach lines. The water is from Cincinnati Water Works. The Facility has been pumping the separators more frequently. When there are prolonged

periods with little or no discharge, 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 to 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. Please note: if the Facility does not need to discharge during a month, then the "AL" code can be used noting there was no discharge. The Facility does not have to discharge just to collect a sample. In addition, if sampling data is in compliance with the daily Oil & Grease limit, but over the 30 day average of 15 mg/L, additional samples can be taken to comply with the monthly limit. This extra data can also help the Facility in tracking what is contributing to the high Oil & Grease numbers. 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, and disposed of off-site.

The Facility repaved the area tributary to Outfall 001 on the west side of the property. The area tributary to Outfall 002 on the east side of the property is to be repaved during the next year.

### COMPLIANCE ATTAINMENT STEPS

Peter Cremer North America has been working to reduce and eliminate violations at its Facility. In the past, tie into the sanitary sewer was investigated. To date, the only sewer on the site is a combined sewer overflow into the Ohio River. There is no sewer available to tie into. On the north side of the Facility, railroad tracks prevent a sewer running in that direction. There is no sewer on the east side of the Facility, and the Ohio River borders the site to the south. There is a sewer several miles from the Facility on the west side. The various companies along Southside Avenue formed a group to look into running a sanitary sewer to this line. At the time, the cost was going to be at least one million dollars. The Facility is purchasing a parcel of land on the north side of Southside Avenue. Sanitary sewer tie-in will continue to be investigated.

Since the August 2012 violation, the Facility has been mapping and dye-testing the lines and drains on-site. The building was built in the 1920s and there were no drawings of it. Peter Cremer is reconstructing what had been built. There are now drawings of the building drains. Copies of these diagrams are to be provided electronically to Ohio EPA. In addition, on January 1, 2013, new water meters will be installed to determine where the incoming water goes and how much is being used and discharged to the drains. Also, as part of this study, the Facility will be doing analytical work on the discharges to better determine which pollutants are coming from which process. The regular hexane extraction for Oil and Grease analytical work will be done, and compared with a silica gel treated with a hexane extraction Oil and Grease analyses

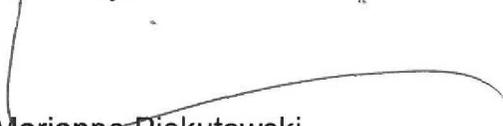
(Method 1664). Many of the products handled on-site will be extracted in the hexane, but are not an oil or grease. This will help to differentiate this. The analytical work, mapping and flow studies are to be completed by February 28, 2013.

Once these studies are completed, the Facility will begin to determine if the oil/water separators are providing adequate treatment and/or whether additional treatment is needed. There are initial designs for a batch treatment system that will be completed once the studies are completed. A copy of this diagram is to also be provided electronically to Ohio EPA. The target date for the permit to install and any needed NPDES permit modification submittals is May 31, 2013.

In the interim, Peter Cremer will be providing monthly email updates to this office on the status of these projects, and a list of the chemicals/products stored on-site is also needed.

Thank you for the time extended during the inspection. If you would have any questions, please contact me at (937) 285-6108.

Sincerely,



Marianne Piekutowski  
Environmental Specialist 2  
Division of Surface Water

MP/tb

cc: Mike Doll, PCNA  
Sarah Keyes, PCNA  
Mike Haught, PCNA

ec: Mark Mann, DSW/CO