



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korteski, Director

August 17, 2007

Re: Washington County
Ohio Power, Muskingum River Plant
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Mark Studenic, General Manager
AEP, Muskingum River Plant
1501 Sparling Road
Waterford, Ohio 45786

Dear Mr. Studenic:

On August 1, 2007, a Compliance Evaluation Inspection (CEI) was conducted at Ohio Power Company's Muskingum River Plant. The purpose of the inspection was to determine Ohio Power's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Jim Ludwig and Mark Stammen, representing Ohio Power, and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected during the inspection. A copy of my inspection report is attached.

As a result of my inspection, I have the following comments:

1. The renewal NPDES Permit will need to be modified to correct two errors. First, the Total Residual Oxidant (TRO) effluent limitation should have been 0.05 mg/l instead of 0.5 mg/l. The second error was the inclusion of Part II, Item W.1. "Chronic Bioassay" needs to be deleted. Chronic bioassay is not required in the NPDES Permit. Ohio EPA hopes to have the corrected copy of these pages out in the near future.
2. The facility is currently investigating ways the river water influent sump is operated. The change in operation will allow for any oil sheens collected on the influent sumps to be directed to the fly ash ponds. Please inform this office when this change occurs.
3. The facility is planning on moving the discharge location of Outfall 002 farther upstream due to an older culver currently in use. The change in location is close enough that antidegradation will not apply. However, when the relocation of Outfall 002 is done, Ohio Power should inform this office in writing of the new location. The NPDES Permit may be modified to change the description of Outfall 002 to the new location.

4. The facility is in the process of raising the dam on the Upper Flyash Impoundment. The raising of the dam will be done gradually as the impoundment continues to be filled.

In conclusion, Ohio Power Company – Muskingum River Plant appeared to be in compliance with its NPDES Permit at the time of the inspection.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "*Facility Pollution Prevention Guide*" (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

No further response to this letter is requested at this time. If you have anyway questions, feel free to contact me at (740) 380-5434.

Sincerely,



Stephen Wells
District Representative
Division of Surface Water

SW/dh

Enclosure

c: Jim Ludwig, Plant Environment Coordinator
c: Mark Stammen, American Electric Power

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00003*OD	OH0006149	August 1, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Ohio Power Company – c/o American Electric Power Muskingum River Plant 1501 Sparling Road Waterford, OH 45786	11:10 a.m.	August 1, 2007
	Exit Time	Permit Expiration Date
	1:00 p.m.	July 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jim Ludwig, Plant Environmental Coordinator	(740) 984-3486

Name, Address and Title of Responsible Official	Phone Number
Mark Studenic, General Manager American Electric Power – Muskingum River Plant 1501 Sparling Road Waterford, OH 45786	(740) 984-2321

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>N/A</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>N/A</u> Sludge Storage/Disposal	<u> </u> Other
<u>N/A</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached report.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

8/16/07

Date



Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

8/17/07

Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)	X			
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection	X ⁽¹⁾			
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

Comments: ⁽¹⁾ New sanitary sewer for administrative building.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection	X ⁽¹⁾			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule			X	
d. Compliance schedule contained in:				
e. Permittee is meeting compliance schedule			X	

Comments: ⁽¹⁾ Discharge of wastewater due to a boiler slag transport pipe break in August, 2006.
⁽²⁾ Overflow of Unit 5 wastewater pond in November, 2006.
⁽³⁾ pH violation of Outfall 001.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator _____ Dual Feed <u>X</u>	X			
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: # of shifts: <u>2</u> Days/Week: <u>7</u>				
e. Operator holds unexpired license of class required by permit Class: <u>N/A</u>			X	
f. Routine and preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained	X			
i. Any plant bypasses since last inspection	X ⁽¹⁾			
j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number	X			
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: ⁽¹⁾ Unit 5 wastewater pond overflow in November, 2006.

Collection System	Yes	No	N/A	N/E
a. Percent combined system: <u>0%</u>			X	
b. Any collection system overflows since last inspection (CSO ___ SSO ___)			X	
c. Regulatory agency notified of overflow (SSOs)			X	
d. CSO O and M plan provided and implemented			X	
e. CSOs monitored and reported in accordance with permit			X	
f. Portable pumps used to relieve system			X	
g. Lift station alarm systems provided and maintained			X	
h. Are lift stations equipped with permanent standby power or equivalent portable gen.			X	
i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection			X	
j. Any complaints received since last inspection of basement flooding			X	
k. Are any portions of the sewer system at or near capacity			X	

Comments:

H. SLUDGE MANAGEMENT

- a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ X N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current				X
c. Sludge adequately disposed: (Method: sludge hauler)	X			
d. If sludge is incinerated, where is ash disposed of?			X	
e. Is sludge disposal contracted (Name: Haas Septic)	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
i. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

Comments:

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement		Yes	No	N/A	N/E
a.	Primary flow measuring device properly operated & maintained. Type of device: <input type="checkbox"/> ultrasonic & parshall flume <input checked="" type="checkbox"/> calculated from influent – Outfall 001 <input checked="" type="checkbox"/> weir <input type="checkbox"/> Other (Specify: _____) <input type="checkbox"/> ultrasonic & weir <input type="checkbox"/> Runtime meter on Influent Pumps	X			
b.	Calibration frequency adequate (date of last calibration <u>at least 1/year</u>)	X			
c.	Secondary instruments (totalizers, recorders etc.) properly operated and maintained	X			
d.	Flow measurement equipment adequate to handle expected ranges of flows	X			
e.	Actual flow discharged is measured	X			
f.	Flow measuring equipment inspection frequency: <input checked="" type="checkbox"/> Daily <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Other				

Comments:

Part 2 - Sampling		Yes	No	N/A	N/E
a.	Sampling location(s) are as specified by permit	X			
b.	Parameters and sampling frequency agree with permit	X			
c.	Permittee uses required sampling method	X			
d.	Sample collection procedures are adequate	X			
i.	Samples refrigerated during compositing	X			
ii.	Proper preservation techniques used				X
	Conform with 40 CFR 136.3				X
e.	Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f.	Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3: Laboratory – General		Yes	No	N/A	N/E
a.	EPA approved analytical testing procedures used (40 CFR 136.3)				X
b.	If alternate analytical procedures are used, proper approval has been obtained				X
c.	Analyses being performed more frequently than required by permit		X		
d.	If (c) is yes, are results reported in permittee's self-monitoring report			X	
e.	Commercial laboratory used	X			
	1. Parameters analyzed by commercial lab: <u>Douhan - Mercury</u>				
	2. Lab name: <u>Kemron – everything except pH, TRC</u>				

Comments:

