



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 Korleski, Director

July 21, 2008

Re: Washington County
Duke Energy Ohio, Inc.
Washington
Compliance Evaluation Inspection (CEI)
Correspondence (IWW)

Mr. Ron Cremeans, District Manager
Duke Energy Ohio, Inc.
Route 1, Box 29B, S.R. 83
P.O. Box 1329
Beverly, Ohio 45750

Dear Mr. Cremeans:

On June 19, 2008, a Compliance Evaluation Inspection was conducted at Duke Energy Ohio's Washington Energy Facility. The purpose of the inspection was to determine Duke's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Robert Rothwell representing Duke and Stephen Wells representing Ohio EPA, Division of Surface Water, Southeast District Office. No wastewater samples were collected as part of the inspection. A copy of inspection report is attached.

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

1. The plant does not operate on a full-time basis. The plant is currently operated on as needed basis. The plant was not operating at the time of the inspection.
2. Duke needs to have the effluent flow meter calibrated at a minimum 1/year to ensure the proper flow monitoring is completed. Please inform this office when the flow meter has been calibrated.
3. The name change for the plant from Cincinnati Gas & Electric to Duke Energy Ohio, Inc. has been processed in SWIMS, however due to a computer glitch, it was not processed in e-DMR. The name change will be completed in the e-DMR system during the next renewal. This should not cause a problem with the new air reporting system due to the facility being connected by the permit number and not name.

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.

In conclusion, Duke Energy Ohio, Inc appeared to be compliance with its NPDES Permit at the time of the inspection.

If you have any questions, feel free to contact me at (740) 380-5434.

Sincerely,



Stephen Wells
District Representative
Division of Surface Water

SW/dh

Enclosure

c: Robert Rothwell, Duke Energy Ohio, Inc.

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00028*CD	OH0127841	June 19, 2008	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Duke Energy Ohio, Inc. - Washington Energy Facility State Route 83 Beverly, Ohio	8:50 a.m.	April 1, 2006
	Exit Time	Permit Expiration Date
	10:20 a.m.	January 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Robert Rothwell, EH&S Manager	(740) 984-3103
Name, Address and Title of Responsible Official	Phone Number
Ron Cremeans, District Manager Duke Energy Ohio, Inc. - Washington Energy Facility Route 1, Box 29B, S.R. 83, P.O. Box 1329 Beverly, Ohio 45750	(740) 984-3100

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>M</u> Flow Measurement	<u>N/A</u> Pretreatment
<u>S</u> Records/Reports	<u>S</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>S</u> Sludge Storage/Disposal	<u>S</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)

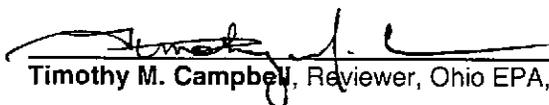
See attached letter.



Stephen Wells, Inspector, Ohio EPA, Southeast District Office

7/21/08

Date



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

7/21/08

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		
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:

F. COMPLIANCE SCHEDULES/VIOLATIONS

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

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator ____ Dual Feed ____	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>	X			
e. Operator holds unexpired license of class required by permit Class: _____			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		
j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: *Facility is a natural gas fired power plant.

H. SLUDGE MANAGEMENT

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

	Yes	No	N/A	N/E
b. Sludge Management Plan current			X	
c. Sludge adequately disposed (Method: <u>Landfill</u>)	X			
d. If sludge is incinerated, where is ash disposed of? _____		X		
e. Is sludge disposal contracted (Name: <u>Northwestern</u>)	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: _____ ultrasonic & parshall flume _____ calculated from influent _____ weir _____ X Other _____ ultrasonic & weir _____ Specify: <u>Mag Meter</u>				
b. Calibration frequency adequate (date of last calibration: _____)		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: _____ X Daily _____ Weekly _____ Monthly _____ Other				

Comments: *Flow meter needs to be calibrated at least 1/year.

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>All NPDES Permit parameters except pH and chlorine</u>				
2. Lab name: <u>Microbac; enviroscience (Toxicity)</u>				

Comments:

Part 3: Laboratory: Quality Control/Quality Assurance	Yes	No	N/A	N/E
f. Quality assurance manual provided and maintained				X
g. Satisfactory calibration and maintenance of instruments and equipment				X
h. Adequate records maintained				X
i. Results of latest U.S. EPA quality assurance performance sampling program: Date: _____ Satisfactory _____ Marginal _____ Unsatisfactory				

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	--	--	--	--	--	--	--

Comments:

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

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

1. What is the cause of the conditions?
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: