



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

April 23, 2010

Re: Washington County
Waterford Energy Facility
Compliance Evaluation Inspection (CEI)
Correspondence (IWW)

Mr. Daniel Moyer, Plant Manager
AEP Waterford Energy Facility
201 Righteous Ridge Road
Waterford, Ohio 45786

Dear Mr. Moyer:

On February 24, 2010, a Compliance Evaluation Inspection (CEI) was conducted at AEP's Waterford Energy Facility. The purpose of the inspection was to determine AEP's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Ron Lighthall representing AEP and Scott Bergreen and Stephen Wells representing Ohio EPA, Southeast District Office. No wastewater samples were collected as part of the inspection. A copy of my inspection report is attached.

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

1. AEP is still considering its options for the discharge from Outfall 601. AEP would like to eliminate this outfall from the NPDES Permit due to the infrequency of the discharge due to the operation of the facility. Please keep this office informed on the progress of this flow change.
2. The plant was not in operation at the time of the inspection. The facility is not operated as a 24/7 based load plant. The operation of the facility is determined by electricity demand and/or other economic factors. Since, the plant was not in operation, no process wastewater was being discharged.
3. A discussion was held on the disposal options for the solids generated from the Muskingum River intake water used at the facility. Currently, these solids are de-watered and disposed of in a sanitary landfill. If AEP wishes to pursue a beneficial re-use of these solids, please contact this office.

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, AEP's Waterford Energy Facility appeared to compliance with its NPDES Permit at the time of the inspection.

No response is requested to the above comments. 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: Ron Lighthall, AEP

NPDES Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00027*CD	OH0127825	February 24, 2010	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
AEP Ohio Waterford Energy Facility Township Road 103 Waterford, Ohio 45786	9:40 a.m.	August 1, 2007
	Exit Time	Permit Expiration Date
	1:00 p.m.	July 31, 2011

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Ron Lighthall, Plant Environmental Coordinator	(740) 984-3226
Name, Address, & Title of Responsible Official	Phone Number
Daniel Moyer, Plant Manager AEP Ohio Waterford Energy Facility 201 Righteous Ridge Road Waterford, Ohio 45786	(740) 984-3201

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>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>--</u> Other
<u>N/A</u> Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

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

See attached letter.



 Stephen Wells, Inspector, Ohio EPA, Southeast District Office

4/23/10

 Date



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

4/26/10

 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 & location of discharge points are as described in permit	X			

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	

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated & 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>	X			
e. Operator holds unexpired license of class required by permit. Class:			X	
f. Routine & preventive maintenance schedule/performed on time	X			
g. Any major equipment breakdown since last inspection		X		
h. Operation & maintenance manual provided & maintained	X			
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses: On MORS: 800 No.:			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

H. SLUDGE MANAGEMENT

	YES	NO	N/A	N/E
a. Sludge adequately disposed. Method: <u>Landfill</u>	X			
b. If sludge is incinerated, where is ash disposed of?			X	
c. Is sludge disposal contracted? Name: <u>Northwestern</u>	X			
d. Has amount of sludge generated changed significantly since last inspection		X		
e. Adequate sludge storage provided at facility	X			
f. Land application sites monitored and inspected per state rules			X	
g. Records kept in accordance with state rules	X			
h. Any complaints received in last year regarding sludge		X		
i. Is sludge adequately processed (digestion, dewatering, pathogen control) in accordance with Ohio EPA rules	X			

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: <input type="checkbox"/> Calculated from influent: <input type="checkbox"/> Weir: <input type="checkbox"/> Other: <input checked="" type="checkbox"/> Ultrasonic & weir <input type="checkbox"/> specify: <u>Rosemount Vortex</u>	X			
b. Calibration frequency adequate. Date of last calibration: <u>10/22/09</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: Daily: <input checked="" type="checkbox"/> Monthly: <input type="checkbox"/> Weekly: <input type="checkbox"/> Other: <input type="checkbox"/>				

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, & maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

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: Parameters analyzed by commercial lab: <u>All parameter except Chlorine and pH</u> Lab name: <u>Dolan (Mercury); Microbac</u>	X			

Part 3 – Laboratory, Quality Control/Quality Assurance	YES	NO	N/A	N/E						
a. Quality assurance manual provided and maintained	X									
b. Satisfactory calibration and maintenance of instruments and equipment	X									
c. Adequate records maintained	X									
d. Results of latest U.S. EPA quality assurance performance sampling program: Date: <u>DMR-QA 29</u>	<table border="1"> <thead> <tr> <th>Satisfactory</th> <th>Marginal</th> <th>Unsatisfactory</th> </tr> </thead> <tbody> <tr> <td>X</td> <td></td> <td></td> </tr> </tbody> </table>				Satisfactory	Marginal	Unsatisfactory	X		
Satisfactory	Marginal	Unsatisfactory								
X										

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

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

Comments: No discharge from facility.

K. MULTIMEDIA OBSERVATIONS

Collection System	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?