OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

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

August 14, 2007

**RE: WASHINGTON COUNTY
COLUMBUS SOUTHERN
POWER COMPANY
COMPLIANCE EVALUATION
INSPECTION
CORRESPONDENCE (IWW)**

Mike Zwick, Plant Manager
Columbus Southern Power
Waterford Energy Facility
201 Righteous Road
Waterford, OH 45786

Dear Mr. Zwick:

On August 1, 2007, a Compliance Evaluation Inspection (CEI) was conducted at Columbus Southern Power Company's Waterford Energy Facility. The purpose of the inspection was to determine Columbus Southern's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Tom Alberts, Dave Cole, John Ohlinger, Mark Stammen and Mike Zwick representing Columbus Southern 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 my inspection report is attached.

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

1. The signage requirement for the outfalls which discharge to the Muskingum River was left out of the renewal NPDES Permit. However, Columbus Southern is planning on installing the signs where necessary. The information required for the sign are listed below:

    - Name of Facility on the NPDES Permit
    - Ohio EPA NPDES Permit No.
    - Outfall Number
    - Contact Telephone Number

    The information on the sign shall be printed on letters not less than 2 inches in height. The signs shall be a minimum of 2 foot x 2 foot and a minimum 3 feet above ground. The signs shall not be obstructed such that boaters or persons swimming or fishing in the river cannot read the sign. Vegetation shall be periodically removed to keep the sign visible. If the outfall is normally submerged the sign shall indicate this.

2. A discussion on the relocation of the temperature monitoring was held. The facility is considering relocating the temperature probe to a different location to help with meeting the NPDES Permit effluent limitations. If the location is moved, Columbus Southern will need to inform this office in writing of the new location. Ohio EPA may modify the NPDES Permit to reflect this change in location.

3. The plant is currently operating on an as needed basis based on electricity demand. One of the concerns the facility has is if the plant operates on continuous basis, the facility may have difficulty meeting the temperature effluent limitations. Ohio EPA has stated in the past once all three power plants in this area are operating on continual basis the temperature limits may be re-evaluated.

4. In July, Columbus Southern reported foam being observed at and near its discharge. The facility investigated for any possible sources and was unable to determine any cause for the foam. The facility did note that the foam was present on the Muskingum River at Luke's Chute Dam on the other side of the Muskingum River. Ohio EPA has had reports of foaming in the Muskingum River near the lock and dams during periods of extended hot and dry weather in the summer.

   If foaming at the discharge is observed again, Columbus Southern should continue to inspect its facility to determine if the any of its operations are contributing to the foam.

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, Columbus Southern Power Company'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/mlm

Attachment

c: John Ohlinger, O&M Superintendent
c: Mark Stammen, AEP

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00027*CD	OH0127825	August 1, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Columbus Southern Power Company Waterford Energy Facility Township Road 103 Waterford, OH	8:40 a.m.	August 1, 2007
	Exit Time	**Permit Expiration Date**
	10:45 a.m.	July 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
John Ohlinger, Operation & Maintenance Superintendent	(740) 984-3206
Name, Address and Title of Responsible Official	**Phone Number**
Mike Zwick, Plant Manager Columbus Southern Power Company Waterford Energy Facility 201 Righteous Ridge Rd. Waterford, OH 45786	(740) 984-3201

C. AREAS EVALUATED DURING INSPECTION

S	Permit	S	Flow Measurement	N/A	Pretreatment
S	Records/Reports	N	Laboratory	N/A	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N/A	Sludge Storage/Disposal		Other
N/A	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 — Date: 8/15/07

Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office — Date: 8/15/07

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

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 plus portable generator and pumps	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: 4 Days/Week: 7				
e.	Operator holds unexpired license of class required by permit Class: N/A			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:

Collection System		Yes	No	N/A	N/E
a.	Percent combined system: 0%			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: landfill)	X			
d.	If sludge is incinerated, where is ash disposed of?		X		
e.	Is sludge disposal contracted (Name: Waste Management)	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 (Specify: Rosemount Vortex) _____ ultrasonic & weir _____ Runtime meter on Influent Pumps				
b.	Calibration frequency adequate (date of last calibration at least 1/year)	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:

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 1. Parameters analyzed by commercial lab: Doohan - Mercury 2. Lab name: Kemron – everything except pH, TRC	X			

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: * Facility is doing DMR-QA Studies.

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	None	

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: