



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

November 25, 2009

Re: Lawrence County
The Cincinnati Gas & Electric Co.
Hanging Rock Energy Facility
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Paul Lesner, Production Manager
Cincinnati Gas and Electric Company
1395 County Road 1A
Ironton, Ohio 45638

Dear Mr. Lesner:

On November 5, 2009, a Compliance Evaluation Inspection (CEI) was conducted at Cincinnati Gas and Electric Company's plant. The purpose of the inspection was to determine Cincinnati's compliance with its National Pollutant Discharge Elimination System (NPDES) Permit. Present for the inspection were Bob Synder representing Cincinnati and Scott Foster 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. Since the last inspection, Hanging Rock has installed a high water alarm on the chiller sump and rearranged the pump and discharge from chemical building.
2. Hanging Rock has changed the pump and level discharges from the oil/water separators to allow for better operation. Hanging Rock is investigating the connecting the composite samplers to the flow meter or pumps to allow for a more representative sample to be collected.
3. Hanging Rock has changed the location of its upstream sampling location for the toxicity tests due to federal security regulations. Hanging Rock is now using influent river water as its upstream sample water which is out of the mixing zone of its effluent discharge. Using the influent river water is acceptable for the upstream sample.

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, Cincinnati Gas & Electric Company's Hanging Rock Facility appeared to be in compliance with its NPDES Permit at the time of the inspection.

No response is requested to the comments above.

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: Bob Rothwell, Cincinnati Gas & Electric
c: Bob Synder, Cincinnati Gas & Electric

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|-------------|-----------|------------------|-----------------|-----------|---------------|
| 0IB00032*DD | OH0127931 | November 5, 2009 | C | S | 2 |

B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|--|------------|------------------------|
| The Cincinnati Gas & Electric Company Hanging Rock Facility 1395 County Road 1A Ironton, Ohio 45638 | 12:25 p.m. | August 1, 2007 |
| | Exit Time | Permit Expiration Date |
| | 1:45 p.m. | July 31, 2011 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|--|-----------------|
| Bob Rothwell, EH&S Coordinator | (740) 984-3103 |
| Bob Synder, Plant Engineer | (740) 547-3003 |
| Name, Address and Title of Responsible Official | Phone Number |
| Paul Lesner, Production Manager The Cincinnati Gas & Electric Company 1395 County Road 1A Ironton, Ohio 45638 | (740) 547-3001 |

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>S</u> Sludge Storage/Disposal | <u>N</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

11/25/09

Date



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

11/25/09

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 | | | |

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 and Maintained | Yes | No | N/A | N/E |
|---|-----|----|-----|-----|
| a. Standby power available: Generator <u>X</u> 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>3</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 | | |

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 | | | | |
| c. Sludge adequately disposed (Method: *) | | | | |
| d. If sludge is incinerated, where is ash disposed of? _____ | | | | |
| e. Is sludge disposal contracted (Name: <u>Rumpke</u>) | | | | |
| f. Has amount of sludge generated changed significantly since last inspection | | | | |
| g. Adequate sludge storage provided at plant | | | | |
| h. Land application sites monitored and inspected per SMP | | | | |
| i. Records kept in accordance with state and federal law | | | | |
| j. Any complaints received in last year regarding sludge | | | | |
| k. Is sludge adequately processed (digestion, dewatering, pathogen control) | | | | |

Comments: *Mud removed from sediment tank is disposed of at landfill.

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 _____ Other _____ ultrasonic & weir _____ X Specify: <u>Magmeter</u> | X | | | |
| 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: *Magmeter does not require calibration as per manufacturer.
 Oil and Grease flow meters are calibrated 1/year.

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?