



State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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www.epa.state.oh.us

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

December 7, 2007

Re: Lawrence County
Duke Energy Ohio
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Paul Lesner, Production Manager
Duke Energy Ohio, Inc.
1395 County Road 1A
Ironton, Ohio 45638

Dear Mr. Lesner:

On November 14, 2007, a Compliance Evaluation Inspection (CEI) was conducted at Duke Energy Ohio's Hanging Rock plant. 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 Bob Rothwell and Bob Synder 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 my inspection report is attached.

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

1. The sampling requirements at Outfalls 602 and 604 were discussed. The facility does not currently have a location where a composite sampler can be connected to grab a sample from the two sumps for each outfall. A manual composite is currently being obtained. If a composite sampler would be installed, each discharge that makes up the outfall would need to be sampled. The facility is still investigating how to collect a combined sample for outfalls 602 and 604. Please inform this office if the sampling locations are moved.
2. The facility is using a Hach 2010 meter to monitor for chlorine residual. According to plant staff the Hach meter has detection level of 0.01 mg/l for chlorine residual. The use of the Hach meter is acceptable for the purpose of monitoring and reporting for the NPDES Permit.
3. The name change for the facility to Duke Energy Ohio, Inc. is currently in the process of being issued.

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 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, Duke Energy Ohio, Inc.
c: Bob Synder, Duke Energy Ohio, Inc.

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01B00022*DD	OH0127931	November 14, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Duke Energy Ohio, Inc. - Hanging Rock Facility 1395 County Road 1A Ironton, Ohio 45638	9:45 a.m.	August 1, 2007
	Exit Time	Permit Expiration Date
	11:30 a.m.	July 31, 2007

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 Duke Energy Ohio, Inc. 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

12/7/07

Date



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

12/7/07

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		
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: *The facility name change to Duke Energy Ohio, Inc. is in the process of being completed.

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 <input checked="" type="checkbox"/> 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		

Comments:

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

Comments:

H. SLUDGE MANAGEMENT

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

	Yes	No	N/A	N/
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: _____)				
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.

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: *Outfall 001 was not discharging during the inspection.

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: