



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

May 14, 2009

**Re: Belmont County
First Energy - Burger Plant
NPDES Permit 01B0002*ID
Compliance Evaluation Inspection
Correspondence (IWW)**

Mr. Frank Lubich
First Energy - Burger Plant
57246 Ferry Landing Road
Shadyside, Ohio 43947

Dear Mr. Lubich:

On April 20, 2009, Tim Campbell and I conducted a Compliance Evaluation Inspection (CEI) of the First Energy (formerly Ohio Edison Company) R.E. Burger Power Plant. Scott Brown, John White, Bob Wilson and Danielle Schneider represented First Energy (FEB) during the inspection.

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, federal number OH0011592, state number 01B00002*ID. Wastewater samples were not taken. A copy of the inspection report form is attached.

Based on the inspection and file review, the Ohio Edison Company Burger facility was found to be in compliance on the day of the inspection. The following is a summary of my comments and recommendations:

1. Be advised that the NPDES permit renewal application is required to be submitted 180 days prior to the expiration date of the permit (1/31/2010).
2. The current NPDES permit contains a compliance schedule. FEB has met all of the milestones contained in the schedule.
3. FEB has completed connection of outfall 012, the sewage treatment plant (STP), to the discharge line to the flyash pond, outfall 003. An NPDES permit modification is being processed for this. In addition, the sewage treatment plant at outfall 004 has been taken out of service and the sewage has been re-routed to the STP at outfall 012.
4. A review of the Discharge Monitoring Reports (previously labeled Monthly Operating Reports) since the last inspection conducted November 5, 2007, shows only 2 violations at outfall 012 for metals. Once the permit is modified,

these limits will no longer apply at this outfall, therefore the violations are insignificant, since they occurred after connection to the flyash pond.

5. The new operator certification rules require industrial facilities that have small sanitary sewage plants that do not receive industrial waste to be operated by a class A certified wastewater operator. This requirement will be included in your NPDES permit renewal along with a requirement for minimum staffing hours. See Ohio Administrative Code (OAC) Chapter 3745-7-04. Also, there is information on the following website about obtaining the class A certification:

<http://www.epa.state.oh.us/dsw/opcert/opcert.html>

6. Ohio EPA is concerned about FEB's method of Oil and Grease sampling. It is recommended that FEB find a way to take the sample directly into the glass jar without contamination. Recommended options for sampling at the weir include suspending just the glass jar on a wire and rope to take the sample, or purchasing a dipping stick that can hold a glass jar. The sample can also be taken at the outfall pipe. Provide a sampling method that complies with Standard Methods.
7. It is required that FEB determine a Method Detection Level (MDL) for their chlorine meter in accordance with the steps outlined in Standard Methods.
8. FEB should run the grab sample analyses for Dissolved Oxygen, pH and Total Residual Chlorine required by the NPDES permit at the site rather than transporting them to the lab inside the building. The field data should be reported on the monthly report.
9. The river bank upstream from the coal unloading facility needs to be stabilized against erosion. Areas on the conveyor where coal can fall through should be sealed. Access roads to the river near the unloading facility should be stabilized from erosion. Areas where coal will no longer be handled or stored should have the residual coal cleaned up and stabilized by stone or vegetation.
10. Flyash is usually handled by loading it straight from the plant into trucks for disposal via a hopper. There is also the option to temporarily store it in flyash pond 003. Flyash is currently disposed of at the Tonkovich Flyash Disposal site in Dilles Bottom, across from the plant. If disposal occurs at any other location, FEB is required to notify me at the Ohio EPA Southeast District Office. The bottom ash generated at the Burger plant is sold to Tonkovich Trucking Co. for use as road grit.

11. Ohio EPA remains concerned about groundwater contamination from the ash handling process. Neither flyash pond 002 or 003 is lined. None of the areas around the ponds that are used for staging flyash/bottom ash during flyash removal and handling are lined. There are no groundwater monitoring wells at this facility.

Closure of any flyash or bottom ash pond is considered a modification of a treatment system which requires approval by the Director of OEPA. Any plan to modify these structures must be submitted and approved. The plan must include either a suitable cap to minimize future groundwater contamination and a groundwater monitoring plan, or complete removal of the waste.

Please respond to items #6, 7, 8 and 9 above, in writing, within 30 days of receipt of this notice. If you have any questions, please contact me at your convenience.

Sincerely,



Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosure

- c: Scott Brown, First Energy Corp.
- c: Danielle Schneider, First Energy Burger

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00002*ID	OH0011592	April 20, 2009	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
First Energy Corp., R.E. Burger Plant 57246 Ferry Landing Road Shadyside, Ohio 43947	10:45 a.m.	August 1, 2005
	Exit Time	Permit Expiration Date
	1:00 p.m.	January 31, 2010

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
John White, Maintenance Manager	(740) 671-2922
Bob Wilson, Operations Manager	(740) 671-2902
Danielle Schneider, Environmental Specialist	(740) 671-2918
Scott Brown, Environmental Coordinator	(330) 384-4643
Name, Address and Title of Responsible Official	Phone Number
Frank Lubich First Energy Corp. 57246 Ferry Landing Road Shadyside, Ohio 43947	(740) 671-2901

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>NA</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>S</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>M</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>S</u> Sludge Storage/Disposal	<u> </u> Other
<u>NA</u> Collection System		

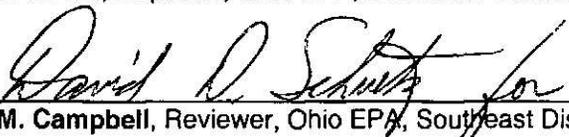
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated; NA = Not Applicable)

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

Self monitoring - see letter Items 6 & 7.


Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

5/14/09
Date


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

5/14/09
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*		

*Modification is pending that addresses changes.

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: <u>permit</u>	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: _____ 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: No. of shifts: <u>1</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 No.			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

*Certified operator not required until NPDES permit is renewed.

