



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

June 12, 2008

Re: Muskingum County
AEP Dresden Plant
2008 CEI
Correspondence (IWW)

Mr. Ron Lighthall, Env. Coordinator
AEP Dresden Plant
9595 McGlade School Road
Dresden, Ohio 43821

Dear Mr. Lighthall:

On May 1, 2008, Steve Wells, Ohio EPA, Southeast District, Division of Surface Water, and I inspected your facility at Dresden, Ohio. We were accompanied by Mark Stammen, AEP Dresden; Ronald Borton, AEP Dresden; and you. The following are comments from the inspection:

The Liner for the Decant Pond:

At the time the dredge ponds were constructed, the Ohio EPA did not require a clay liner. The PTI for construction of the ponds was approved without requiring installation of a clay liner and a liner would not be required in the future.

Stormwater Issues:

It was discussed during the inspection that new holes would be bored half way up on the headwall of the 2 storm water ponds to allow lowering of the water. **Also**, an inquiry of chemical spraying for dust control was researched and currently the Division of Surface Water does not have an issue with the application of such chemicals. Mr. Stammen was referred to Mr. Joe Laughery of the Ohio EPA Division of Air Pollution Control.

001 Outfall:

We discussed the need to have an NPDES permit for the discharge from the dredging operations at the Dresden facility. We are still researching this and we will inform you of our decision.

AEP Dresden Plant
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Attached is a copy of my inspection report. If you have any questions or additional comments, please feel free to call me at (740) 380-5227.

Sincerely,



Scott Foster
Environmental Specialist 2
Division of Surface Water

SF/dh

Enclosure

c: Steve Wells; DSW, Ohio EPA, SEDO
c: Ronald Borton, AEP Dresden
c: Mark Stammen, AEP Dresden

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00031*BD	OH0127892	May 1, 2008	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
AEP Dresden Plant 9595 McGlade School Road Dresden, Ohio 43821	10:00 a.m.	July 1, 2007
	Exit Time	Permit Expiration Date
	12:15 p.m.	July 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Mark J. Stammen, Environmental Specialist IV	(614) 716-1541
Name, Address and Title of Responsible Official	Phone Number
Ron Lighthall, Plant Environmental Coordinator 9595 McGlade School Road Dresden, Ohio 43821	(740) 455-6271

C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>S</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)

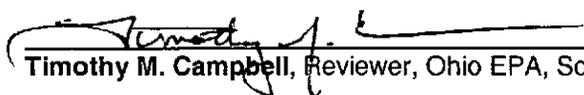
See Attached Letter.



Scott Foster, Inspector, Ohio EPA, Southeast District Office

6/12/08

Date



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

6/12/08

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:

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: Facility is still under construction.

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: # of shifts _____ Days/Week _____			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/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: _____)				
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:

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: <input type="checkbox"/> ultrasonic & parshall flume <input type="checkbox"/> calculated from influent <input type="checkbox"/> weir <input checked="" type="checkbox"/> Other <input type="checkbox"/> ultrasonic & weir <input type="checkbox"/> Specify: _____	X			
b.	Calibration frequency adequate (date of last calibration: _____)				
c.	Secondary instruments (totalizers, recorders etc.) properly operated and maintained				
d.	Flow measurement equipment adequate to handle expected ranges of flows				
e.	Actual flow discharged is measured				
f.	Flow measuring equipment inspection frequency: _____ Daily _____ Weekly _____ Monthly _____ Other				

Comments: Plant is not discharging at this time.

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: Plant is not discharging at this time.

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			X	
	1. Parameters analyzed by commercial lab: _____				
	2. Lab name: <u>AEP Dolan Lab-WW</u>				

Comments: Plant is not discharging at this time.

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	-----	-----	-----	-----	-----	-----	OK

Comments:

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: