



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1B0000020110607

CLERMONT DUKE ENERGY-WALTER C. BECKJORD STATION WALLER, MICHELLE 2011/06/07



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 7, 2011

Pat Coyle, Senior Environmental Specialist
EM740, 139 East Fourth Street
Cincinnati, Ohio 45202

RE: Duke Energy, W.C Beckjord Station, Compliance Evaluation Inspection,
NPDES Permit No. OH0009865/ OEPA Permit No. 1B00000*KD and **Notice
of Violation**

Mr. Coyle:

On May 25, 2011 Mike Zimmerman and I conducted an NPDES Compliance Evaluation Inspection at the Duke Energy W.C Beckjord Station. Mike Byrd, Matt McManus, Chris Osterbrink and yourself were present for the facility. The purpose of the inspection was to evaluate compliance with the terms and condition of the facility's NPDES permit.

A copy of the Compliance Evaluation Inspection report is enclosed. All evaluated areas except one received "Satisfactory" ratings. Operations & Maintenance received a "Marginal" rating due to Operator of Record issues stated at the end of this report. **Please pay attention to the "Items Requiring Correction" (shown in bold type) within the report.**

During the inspection the "*Coal Spillage Minimization Plan*" that was required under Part I, C. Schedule of Compliance in the NPDES permit was discussed. Duke Energy submitted this plan on July 1, 2010 to the Ohio EPA. The Ohio EPA has reviewed this plan and has no comments. This letter shall serve as notice of approval for the "*Coal Spillage Minimization Plan*".

If you have any questions, please contact me by phone at (937) 285-6028 or by e-mail at michelle.waller@epa.state.oh.us.

Respectfully,

Michelle Waller
Environmental Specialist II
Division of Surface Water

Enclosures

Ec: Chris Osterbrink, Duke Energy
Mike Byrd, Duke Energy



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11B00000*JD	OH0009865	5/25/2011	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Duke Energy Corporation, W.C. Beckjord Station 755 US Route 52 New Richmond, Ohio 45157	10:15 AM	8/1/2009
	Exit Time	Permit Expiration Date
	2:10 PM	7/31/2013
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Pat Coyle - Corporate NPDES	(513) 287-2268	
Mike Byrd - Environmental Coordinator	(513) 467-5105	
Matt McManus - Lab Supervisor	(513) 467-5105	
Chris Osterbrink - Operations Manager		
Name, Address and Title of Responsible Official	Phone Number	
Pat Coyle, Senior Environmental Specialist EM740, 139 East Fourth Street Cincinnati, Ohio 45202	(513) 509-0040	

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
S	Permit	S	Flow Measurement
S	Records/Reports	S	Laboratory
M	Operations & Maintenance	S	Effluent/Receiving Waters
S	Facility Site Review	S	Sludge Storage/Disposal
N	Collection System	N	Pretreatment
		S	Compliance Schedule
		S	Self-Monitoring Program
		S	Other

Section D: Summary of Findings (Attach additional sheets if necessary)	
<p>The laboratory did not receive an in depth evaluation during the inspection. Please be advised that the next inspection will include a more detailed lab evaluation using the General Lab Criteria form which has been shared with Duke Energy.</p>	
Inspector	Reviewer
<p><i>Michelle Waller</i> Michelle Waller Division of Surface Water Southwest District Office</p>	<p><i>Martyn Burt</i> Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office</p>
<p>6/13/11 Date</p>	<p>6/13/11 Date</p>

Sections E thru K: Complete on all inspections as appropriate
 Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Do Categorical Standards apply?...If yes, list applicable standards.. N/A
- (d) Product(s) and production rates conform with permit application (Industries)..... Y
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application... Y
- (g) All discharges are permitted..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

Comments/Status:

Section F: Compliance

- (a) Any significant violations since the last inspection..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations..... Y
- (d) Permittee has a compliance schedule..... Y
- (e) Compliance schedule contained in...NPDES Permit
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection N

Comments/Status:

Final Effluent Violations review 5/2008 – 5/2011

Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	Total Suspended Solids	30D Qty	454	474.752	4/1/2009
003	Total Suspended Solids	30D Conc	30	37.3	11/1/2009
003	Total Suspended Solids	30D Qty	1363	1681.77	11/1/2009

Notification letters were sent by Duke Energy for the violations.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

(a) Standby power available.....generator or dual feed Y

i. How often is the generator tested under load.....
Monthly.

(b) Which components have an alarm system available for power or equipment failures.....
None.

(c) All treatment units in service other than backup units..... Y

(d) What method is used for scheduling routine & preventative maintenance (calendar, software, etc.).....
Calendar.

(e) Any major equipment breakdown since last inspection..... N

(f) Operation and maintenance manual provided and maintained..... N

(g) Any plant bypasses since last inspection..... N

(h) Any plant upsets since last inspection..... N

Comments/Status:

Winelco services the sanitary package plant.

Section H: Sludge Management

- (a) Method of Sludge Disposal... Land Application
 Haul to Another NPDES Permittee
 Haul to a Mixed Solid Waste Landfill

(a) Has amount of sludge generated changed significantly since the last inspection..... N

(b) How much sludge storage is provided at the plant.....

No additional storage beyond package plant.

(c) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06)..... Y

(d) Any complaints received in last year regarding sludge..... N

(e) 5/8" screen at headworks for facilities that land apply sludge..... N/A

(f) Are sludge application sites inspected to verify compliance with NPDES permit..... N/A

(g) Is a contractor used for sludge disposal..... Y

If so, what is the name of the contractor.....

Winelco disposes of the package plant sludge. The ash goes to the Duke Zimmer landfill.

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

(a) Primary/Secondary flow measuring devices operated and maintained..... Y

Type of device (e.g. weir with ultrasonic level sensor):

Pump run times are used to calculate flows.

(b) Calibration frequency adequate N/A
(Date of last calibration:)

(c) 24-hour recording instruments operated and maintained..... N/A

(d) Flow measurement equipment adequate to handle full range of flows..... Y

(e) Actual flow discharged is measured..... N

(f) Flow measuring equipment inspection frequency

Daily Weekly monthly other

Comments/Status:

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... N/E
(see GLC page)
- (d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y

Comments/Status:

Records are kept for the life of the station.

Section I: Self-Monitoring Program (con't)

Laboratory:

General

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite..... Y
- (b) Do SOP's include the following if applicable..... Y
 - Title
 - Scope and Application
 - Summary
 - Sample Handling and Preservation
 - Interferences
 - Apparatus and Materials
 - Reagents
 - Procedure
 - Calculations
 - Quality Control
 - Maintenance
 - Corrective Action
 - Reference (Parent Method)

Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.

- (c) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (d) If alternate analytical procedures are used, proper approval

- has been obtained..... N/A
- (e) Analyses being performed more frequently than required by permit. N
- (f) If (e) is yes, are results in permittee's self-monitoring report..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment. N/E
(see score from GLC page)
- (h) Commercial laboratory used..... Y
Parameters analyzed by commercial lab: Metals, CBOD, fecal coliform,
O&G, nitrate-nitrite.

Lab name: Test America

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance
sampling..... Y
Date: A year ago. Beckjord is currently undergoing their DMRQA for
this year.
- (b) Were any parameters "Unsatisfactory"..... Y
- (c) Reasons for "Unsatisfactory" parameters.....

Cadmium was listed as "Unsatisfactory", but Beckjord did not need to sample for cadmium.

Comments/Status:

URS does low level mercury sampling for Beckjord. Winelco does the biological samples.

Section J: Effluent/Receiving Water Observations

- Outfall # 001 - Cooling water discharge. Discharge point is submerged.
- Outfall # 002 - North Ash Pond "B" - Slight foam.
- Outfall # 003 - South Ash Pond "C" - Slightly turbid.
- Outfall # 005 - Sewage Treatment Plant . Discharge clear.
- Outfall # 009 - Oil and Grease Separator – Trickle at outfall, no oil sheen, clear.
- Outfall # 016 - Storm water outfall – no flow.
- Outfall # 025 – Storm water runoff from Pond Run Ash Landfill sedimentation pond – No flow was going over the v-notch weir. Weir box was not sealed and leaked around the sides/bottom. Repairs are planned.
- Outfall # 023 – Ground Water Interceptor Well discharge – Was not flowing during the inspection.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (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/Status:

Notice of Violation and Item Requiring Correction

1. *NPDES Permit Part II, Other Requirements, Section P, Operator Certification Requirements, 2. Operator of Record:* This section of the NPDES permit requires Duke Energy to have a Certified Operator for the facility on record with the Ohio EPA. Ohio EPA currently has Tony Mounce on record as the Operator for the facility. During the inspection it was stated that Tony no longer attends the facility and Greg Ross and Andy Griner for Winelco act as Operator of Record for Beckjord. **Within 7 days of the receipt of this letter, submit an updated Operator of Record notification to the Ohio EPA.** This form may be found on the Ohio EPA website at:
http://epa.ohio.gov/portals/28/documents/opcert/Operator_of_Record_Notification_Form.pdf
2. *NPDES Permit Part II, Other Requirements, Section P, Operator Certification Requirements, 3. Minimum Staffing Requirements:* Duke Energy is required by the permit to meet the minimum staffing requirements of the Ohio Administrative Code paragraph (C)(1) of rule 3745-7-04. The Beckjord NPDES permit lists the station as a Class I facility, which requires the Operator of Record to visit the facility 3 times a week for a total of 1.5 hours. Looking at the log information for the operators from Winelco who have visited the facility, only twice a week visits have been made to Beckjord. **Immediately begin complying with the minimum staffing hours required by the permit.**

