

**Environmental
Protection Agency**

Governor

Lt. Governor

Director

September 9, 2011

RE: ASHTABULA CO. PORT AUTHORITY POWER
PLANT (FKA FIRSTENERGY, CEI PLANT C)
NPDES PERMIT NO. 3IB00021
ASHTABULA TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Sean Ratican, President
Ashtabula County Port Authority
17 North Market Street
Jefferson, OH 44047

Dear Mr. Ratican:

On September 7, 2011, a site inspection was conducted at the above referenced facility at 2715 Lake Road East (State Route 531), Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Prior to the inspection I spoke with Tim Honkala, Plant Manager of Praxair and Jason Gyath, Plant Engineer of Praxair. Robert Carlo of Praxair represented Praxair, the Port Authority's operator, on the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last inspection was conducted on November 16, 2010.

The site, known as the former FirstEnergy, Ohio Edison Plant C, Cleveland Electric and Illuminating Co. (CEI) and Union Carbide Power Plant, is an inactive coal burning power plant that is currently used as a lake water treatment and industrial water distribution system. Currently, the only outfall is Outfall 007, which is the outfall from the water treatment system. Treatment includes screening, oil/water separation, sedimentation, anthracite filtration, and final discharge. Waters that are treated are limited to pump seal water and runoff from the building roof and floor drains located throughout the facility, and surface water runoff in the vicinity of a 500,000 gallon seal water sump/equalization basin. The design flow of the water treatment systems is 1.43 MGD, with an average daily flow of 0.123 MGD.

Observations

Following are observations made during the inspection.

1. The general operation and maintenance of the wastewater treatment system and storm water collection system appeared to be satisfactory.
2. Outfall 007 was observed to be not discharging. The system is only used when the 500,000 gallon basin requires pumping down. The design flow of the water treatment system is 1.43 MGD. The composite samplers were not operating, and are placed into service when the plant is operating.
3. The facility's NPDES permit became effective on August 1, 2007.
4. The Port Authority pumps approximately 15 MGD of raw lake water to existing businesses in the area that were once a part of the Union Carbide Complex. These businesses include Praxair, USALCO, Elkem Metals, ESAB Welding Products, and ASHTA Chemicals.

5. The Port Authority supplies 8.5 MGD to Praxair. The remaining water goes to Millennium-Crystal Global, ESAB Weiding Products, and ASHTA Chemicals. The Port Authority also supplies water to the local fire hydrant system. Millennium uses its water for process water and sanitary, Praxair and ESAB Welding use water for non-contact cooling water, limited sanitary, and fire water loop purposes, and ASHTA and the Port Authority Plant C use the water for limited sanitary and fire water loop purposes.
6. Praxair performs the NPDES permit sampling on behalf of the Port Authority. Praxair also collects and performs the pH sampling at the facility.
7. The EA Group provides Praxair with the sample containers with preservative, and performs laboratory analysis for all parameters except flow rate and pH. Records of pH meter calibration are also maintained by Praxair.
8. Storm water collected in catch basins in the parking areas of the former power plant discharge directly to Lake Erie.
9. The ash pond has been closed under a grant from the Clean Ohio Redevelopment Fund (CORF) grant program as a part of larger renovations at the facility. The pond has had its contents removed and the pond partially backfilled with clean sand, and the outfall from the ash pond has been removed from the permit (former Outfall 004). The ash pond was observed as containing clear storm water. The material in the ash pond was tested and disposed in a landfill.
10. A log book of repairs and observations is maintained at the facility. Praxair personnel perform routine observations, monitor the facility, and perform the sampling (flow readings, and pH). Praxair prepares the electronic discharge monitoring report (eDMR) and submits of the eDMR through Ohio EPA's Web-based application on behalf of the Ashtabula County Port Authority.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2010 through August 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
007	00530	Total Suspended Solids	30D Qty	3.41	3.95154	1/1/2011

The Ashtabula County Port Authority responded to this violation in correspondence dated February 14, 2011. No additional information is required to respond to the violation.

Reporting Violations

No reporting violations were noted for the period reviewed.

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Compliance Schedule Violations

No compliance schedule violations were noted for the period reviewed.

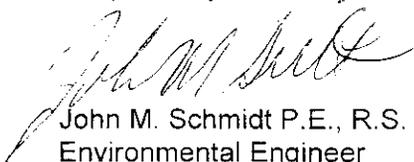
Comments

Ohio EPA offers the following comment:

Proposed Elimination of Seal Water Sump: During the 2010 CEI inspection, the Ashtabula County Port Authority and Praxair inquired about the elimination of the equalization basin known as the seal water sump, a 500,000 gallon basin that once was designed to hold water from the steam turbines when the facility operated as a powerhouse. In 2010, Ashtabula County Port Authority and Praxair examined the feasibility of eliminating this basin and routing the roof storm water runoff as storm water and managing only the treatment system backwash and seal water through the water treatment system. While currently there are no plans to do this, it may be examined again in the future. It was discussed that there is an existing concrete sump inside the building to hold the seal water and that backflow preventers or other instrumentation could be used to prevent untreated backwash or seal water from entering Lake Erie through one of the pump intake lines. Ohio EPA will still need to be assured that the seal water, floor drains, and any backwash water generated is properly treated and not merely circulated through the raw water distribution system. The proposal will require a permit to install (PTI) application to close the existing 500,000 gallon basin and to perform necessary piping changes. The closure plan must include measures to sample and properly dispose of any accumulated materials in the bottom of this basin. The Ashtabula County Port Authority and Praxair could not implement any improvements until they have received an approved PTI. To date Ohio EPA has not received a PTI application for the proposed improvements.

If you have any questions or comments regarding this notification, please feel free to contact me at (330) 963-1175.

Respectively,


John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/mt

pc: Tim Honkala, Plant Manager, Praxair

File: Industrial/Ashtabula County Port Authority – Plant C/PC