



**Environmental
Protection Agency**

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

October 18, 2010

RE: CEI ASHTABULA SERVICE CENTER
OHIO EPA PERMIT 3IM00016
SAYBROOK TWP, ASHTABULA COUNTY
PTI EXECUTION SITE VISIT

Mr. Scott F. Brown, P.E.
FirstEnergy Generation Corp.
76 South Main Street
Akron, Ohio 44308

Dear Mr. Brown:

On October 8, 2010, a site inspection was conducted at the above referenced facility at 22105 South Ridge Road (State Route 84), Saybrook Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Nobody was available from FirstEnergy Generation Corp. during the inspection; however, I contacted Mr. Gary Chack of your office during the visit. 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 and to verify the execution of a permit-to-install (PTI) that included the construction of a lift manhole and piping, dosing tank, and mound onsite treatment system, and elimination of the existing disinfection system and the discharge to waters of the state. The last compliance inspection was conducted on April 27, 2010.

The system consists of a trash trap, equalization tanks, extended aeration system with clarifier, lift station, dosing chamber, slow surface sand filtration, dosing tank, and mound system. Sludge management consists of sludge removal from an aerated sludge holding tank when needed to another POTW. The facility formerly discharged to an unnamed tributary to Red Brook adjacent to the south side of the facility. No backup power is provided to the facility, and the facility is provided with audio and visual alarms.

FirstEnergy obtained a February 26, 2010 modification permit-to-install (PTI) to eliminate the chlorination unit and the discharge, add a 1,000 gallon dosing chamber and pressure dosed mound, thus eliminating the need for an NPDES permit for this facility. Since April 13, 2009, FirstEnergy has eliminated discharge outfall 3IM00016001 from the facility and is treating the equalization basin as a large holding tank, with the tank pumped for off-site disposal. FirstEnergy completed the construction of the improvements in August 2010 and submitted as-built drawings to Ohio EPA on September 7, 2010. FirstEnergy eliminated the oil/water separator discharge outfall 3IM00016002 in March 2010.

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Observations

The following observations were made during the inspection.

1. The design flow of the extended aeration plant is 2,000 gallons per day. The plant operates on a timer, and was running and discharging during the October 8, 2010, inspection.
2. The trash trap was functioning properly during the inspection.
3. The content of the aeration tank had both good color and mixing, and a slightly earthy odor. The color, odor, and mixing are indications of a properly operating facility.
4. The sludge holding tank was clean and operating properly at the time of the inspection.
5. The surface of the clarifier was clear and both the effluent weir and skimmer were functioning properly at the time of this inspection.
6. The disinfection system was noted as properly abandoned.
7. The sand filters were observed as operating. The pumps were cycled and found in operating order. The sand beds were observed in acceptable condition.
8. The mound dosing pumps were cycled and found in operating condition. The mound was found in operating condition (see attached pictures).
9. The final discharge pipe at the tributary to Red Creek was verified as removed.

NPDES Permit Compliance Review

FirstEnergy operates under Permit 3IM00016*CD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period March 1, 2010, through March 1, 2010, indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

No limit violations were noted for the period reviewed. Ohio EPA notes that the code "AL" has been reported in the eDMR for the reporting period. This rationale makes sense as FirstEnergy has been hauling wastewater from the plant during the construction phase, and no longer has discharges to waters of the state once the mound system was completed.

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Reporting Violations

No reporting violations were noted for the reporting period reviewed.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

Other Violations

The following 'other' violations were noted for the reporting period reviewed:

Right of Access to Conduct Inspections – Upon arrival at your facility at 3 p.m on October 8, 2010, Ohio EPA was asked if we were a “state of federal regulatory agency”. Upon stating that I represented the state regulatory agency, I was told that per a directive from your environmental division, access was to be denied the regulatory agency, an environmental person is not available, and to contact Mr. Gary Chack at (216) 308-7831. Upon contacting Mr. Chack, I left a voice mail message at about 3:15 p.m. indicating that he was in violation of the NPDES permit for not allowing access to the property. Mr. Chack returned my call about 3:20 p.m. and granted me access to conduct my inspection. Upon returning to the site about 3:50 p.m., I conducted my inspection.

In most cases, it is a condition of regulatory authorizations for the regulatory authorities to have access to inspect regulated properties unannounced during normal business hours. Part III, Item 10 of your NPDES permit requires FirstEnergy Corp. to allow the Director or his authorized representative to enter upon your premises where the regulated activity is located or conducted, have access to and copy records, and inspect the facilities, equipment, practices, or operations. As such, if an environmental staff person is not maintained at this facility during normal business hours, then someone familiar with the operation should be available or access granted for Ohio EPA to conduct the necessary inspections to ensure compliance with applicable authorizations, laws, and regulations.

Comments

Termination of Your NPDES Permit – Ohio EPA notes that both outfalls 31M00016001 and 31M00016002 have been eliminated, and that you will no longer be discharging to waters of the state which requires an NPDES permit. Ohio EPA recommends that we hold off on termination of this permit and let the permit expire in 2011. If for some reason the mound system is found to be ineffective and FirstEnergy needs to revert back to a surface water discharge, having the existing permit in place will allow FirstEnergy to revert back to the discharge without being subject to antidegradation requirements. Keeping the NPDES permit active will require FirstEnergy to continue to report “AL” for no surface water discharge flow in the monthly eDMR. I will be glad to further speak with you or your staff concerning this matter.

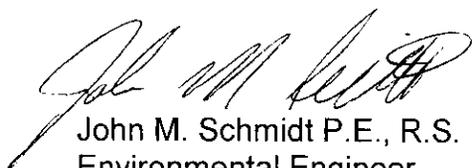
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Based on the above information, FirstEnergy Generation Corp.'s CEI Ashtabula Service Center is considered to be in substantial compliance with the terms and conditions of the NPDES permit. However, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

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

Respectively,

A handwritten signature in black ink, appearing to read "John M. Schmidt".

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

JMS/mt

File: SP/Ashtabula/Saybrook Twp/CEI Ashtabula Service Center



New Mound System