



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

April 8, 2008

RE: ASHTABULA SERVICE CENTER  
PERMIT NO: 3IM00016  
ASHTABULA COUNTY

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

Dear Mr. Brown:

On March 26, 2008, an inspection of the above referenced facility's wastewater treatment system along with the oil/water separator was conducted. The facility was represented by Mr. Bill Larson, Operations Manager and you. The purpose of the inspection was to evaluate the operation and maintenance of the treatment plant along with the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The oil/water separator in the maintenance building was capped off in January 2007. Documentation of the work was submitted to this office. This was the result of an inspection conducted by this writer on February 23, 2006. During the inspection it was noted that wash water and degreasing agents from a pressure washer were being discharged into an oil/water separator and discharged through outfall 3IM00016**002**. Now all wastewater is hauled away.
2. Enviroservice currently pumps out the oil/water separator once per month or as needed.
3. This office does not object to the use of soaps or degreasers provided that pumping records and the final destination of the wastewater are maintained.
4. The design flow of the extended aeration wastewater treatment plant is 2,000 gallons per day.
5. The blower was running, however, the aeration tank was receiving poor aeration. The system should be checked for line blockage or a plugged diffuser.
6. The aeration tank also appeared to be slightly underloaded.
7. The weirs and the sidewalls in the settling tank had scum build-up. See Figure 1. They should be scraped down and the heavy scum removed and properly disposed.
8. There was also scum build-up behind the baffle in the settling tank. The scum should be removed and properly disposed.
9. The side wall of the distribution box was observed leaking onto the ground. See Figure 2. The crack should be identified and sealed.

10. One surface sand filter bed was covered with a layer of sludge. The other surface sand filter bed was draining slowly. This is probably due to the filter media being plugged. See Figures 3 & 4. The filter media should be raked free of the sludge layer. This material should be properly disposed at a solid waste landfill. Based on the condition of the filter media, the media may need to be entirely replaced or just supplemented.
11. Enclosed is a partial list of companies who have submitted approved samples of sand. In general 18 inches of approved filter sand is necessary. Any filter sand that is used must meet the requirements of Ohio Administrative Code (OAC) 3745-42-09. More specifically, for conventional surface sand filters, filter sand shall be washed and free of silt; have an effective size of 0.4 mm to 1.0 mm; and have a uniformity coefficient less than 3.0.
12. The flow is monitored by elapsed time meters
13. The final effluent being discharged from the package plant was clear and appeared to be of satisfactory visual quality.
14. Ake Laboratories has a contract to maintain the facility's wastewater treatment system. You indicated they inspect the plant once per week.
15. Ake Laboratories reports odor, color, turbidity, temperature and flow. Beta Laboratory analyzes for all the other parameters with the exception of Fecal coliform which is performed by E.A. Laboratory.
16. You were informed that a Web-based application for submitting the monthly operating report is currently available. Web addresses are available below which provide information on this topic along with training dates.

This office has recently reviewed your self-monitoring reports covering the period February 1, 2006, through February 29, 2008, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

### LIMIT VIOLATIONS

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00400	pH	1D Conc	6.5	6.1	2/6/2006
001	00610	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.4	6/1/2006
001	50060	Chlorine, Total Residue	1D Conc	0.038	.17	6/12/2006
001	50060	Chlorine, Total Residue	1D Conc	0.038	.1	6/7/2007

### FREQUENCY VIOLATIONS

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
8/1/2006	001	00010	Water Temperature	1/Week	1	0
8/1/2006	001	00083	Color, Severity	1/Week	1	0

Mr. Scott F. Brown, P.E.  
Ashtabula Service Center  
April 8, 2008  
Page 3

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
8/1/2006	001	01330	Odor, Severity	1/Week	1	0
8/1/2006	001	01350	Turbidity, Severity	1/Week	1	0
3/1/2007	001	00530	Total Suspended Solids	1/Quarter	1	0
3/1/2007	001	00610	Nitrogen, Ammonia (NH3)	1/Quarter	1	0
3/1/2007	001	80082	CBOD 5 day	1/Quarter	1	0
3/1/2007	001	00300	Dissolved Oxygen	1/Quarter	1	0

**Please notify this office in writing within 20 days receipt of this letter indicating your intentions to resolve items 5, 7, 8, 9, and 10. The letter should contain dates either actual or proposed for completion of the actions.**

Please note that Ohio EPA has converted from the existing **SWIMware** software to a Web-based reporting system, **e-DMR**. The new reporting system is entirely Web based and accessible via any Internet connection. Ohio EPA Form 4500, commonly known as MORs, will now be called Discharge Monitoring Reports (DMRs or e-DMRs). User training is going to be available in May and October of this year. Please consult the following Web site for updates regarding the specific date:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMRtraining.html>

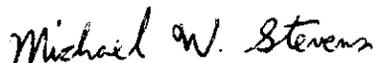
If you need additional information pertaining to the SWIMware replacement e-DMR, consult the following Web site.

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

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens  
Environmental Engineer  
Division of Surface Water

MWS/mt

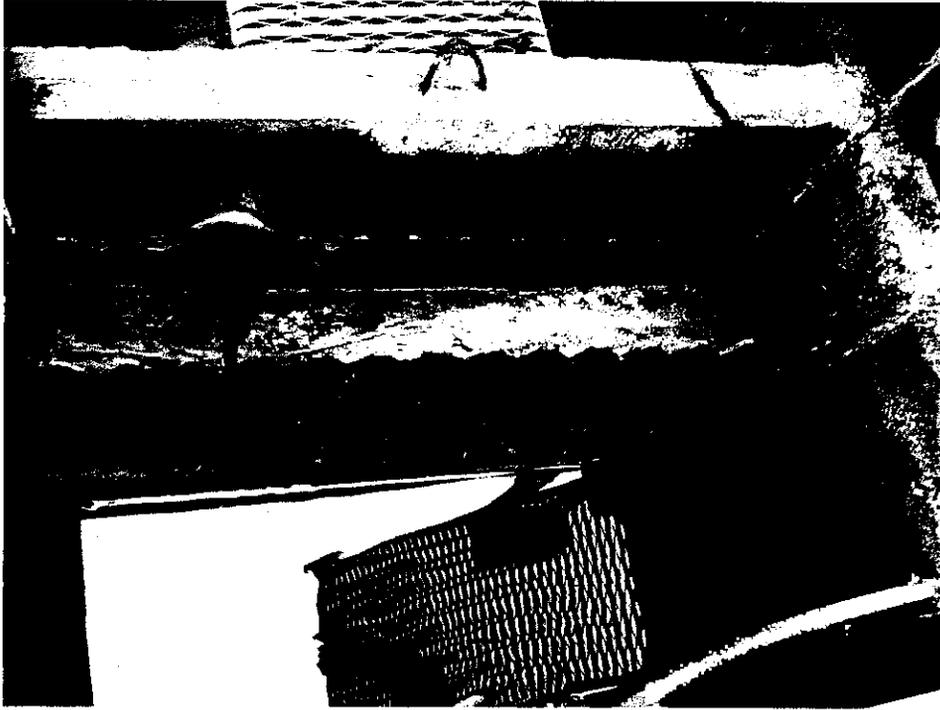


Figure 1

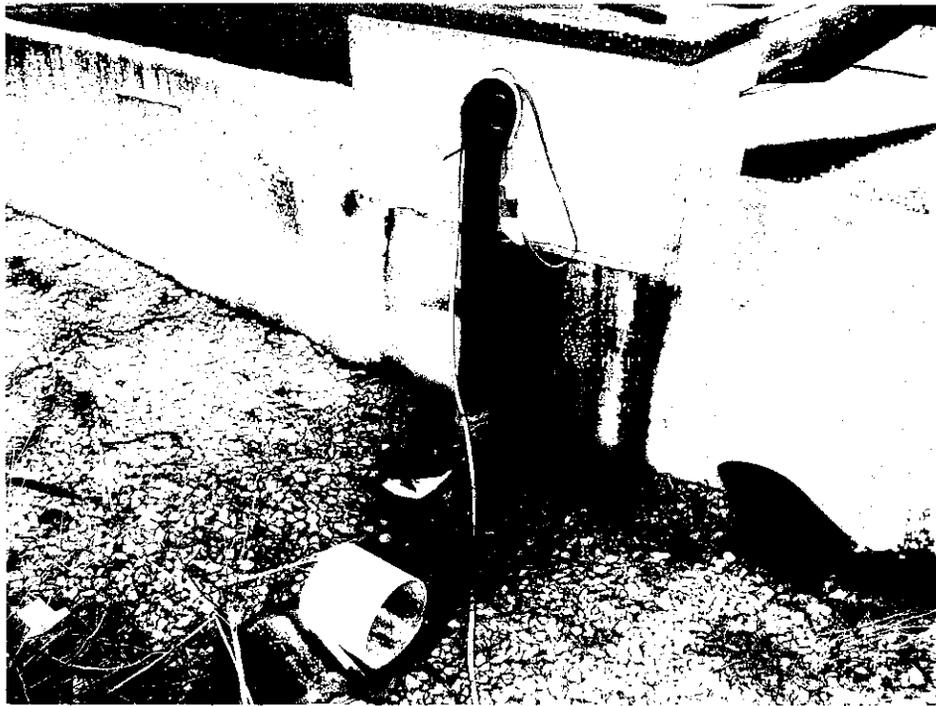


Figure 2

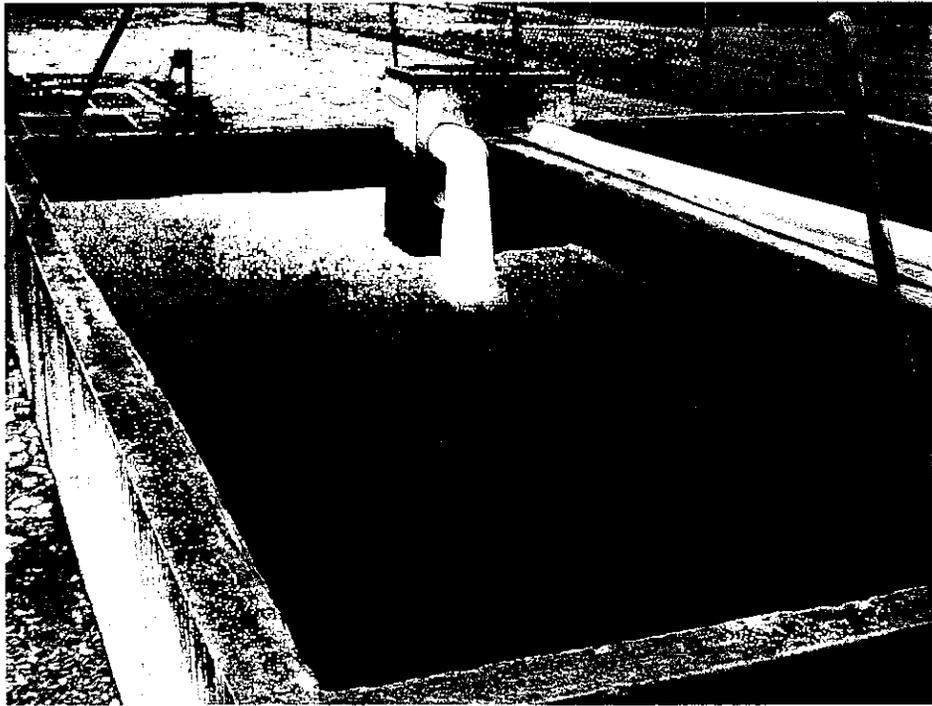


Figure 3

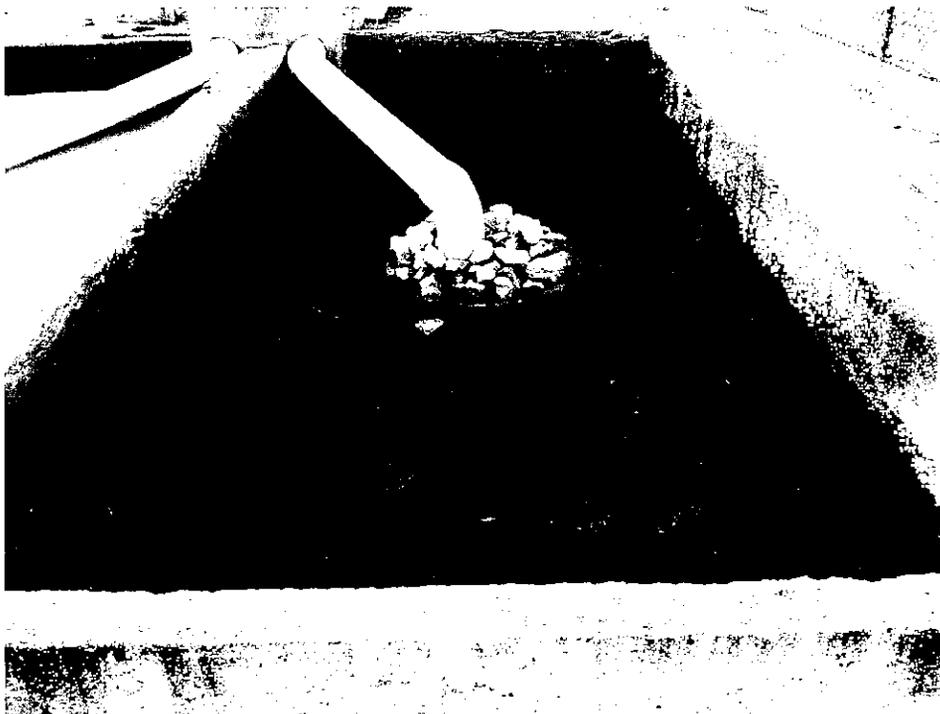


Figure 4