

**Environmental
Protection Agency**

Ed Fitzmaurice, Governor
Lee Fisher, Lt. Governor
Chris Pappalardo, Director

May 17, 2010

RE: CEI ASHTABULA SERVICE CENTER
OHIO EPA PERMIT 3IM00016
SAYBROOK TWP, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

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

Dear Mr. Brown:

On April 27, 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, and Mr. Bill Larson represented FirstEnergy Generation Corp. during 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 compliance inspection was conducted on March 26, 2007.

The system consists of a trash trap, equalization tanks; extended aeration system with clarifier, lift station, dosing chamber, slow surface sand filtration, chlorine disinfection, and dechlorination. 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 alarms.

FirstEnergy obtained a February 26, 2010 modification permit-to-install (PTI) to eliminate the discharge from the chlorination unit, eliminate the chlorination unit, 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. In March 2008, FirstEnergy eliminated the oil/water separator discharge outfall 3IM00016002.

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 was not operating at the time of the inspection, with the equalization tank used as a waste holding tank. The tank appears to have been recently pumped, with Mr. Larson verifying that the tank has been pumped within the past week.

2. The aeration tank, clarifier, and sand filters were verified as empty.
3. The final discharge pipe at the tributary to Red Creek not inspected due to the lack of flow.
4. During the inspection you, noted that Dana Smith and Randy Smith report data on the electronic discharge monitoring reports (eDMRs) for this facility.

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, 2008 through March 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	6.	3/12/2009
001	00610	Nitrogen, Ammonia (NH3	1D Conc	4.5	7.3	3/24/2009
001	00610	Nitrogen, Ammonia (NH3	30D Conc	3.0	4.51667	3/1/2009

An explanation as to why these exceedances occurred must be provided.

Reporting Violations

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

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00083	Color, Severity	1/Week	1	0	08/08/2008
001	01330	Odor, Severity	1/Week	1	0	08/08/2008
001	01350	Turbidity, Severity	1/Week	1	0	08/08/2008
001	00083	Color, Severity	1/Week	1	0	08/22/2008
001	01330	Odor, Severity	1/Week	1	0	08/22/2008
001	01350	Turbidity, Severity	1/Week	1	0	08/22/2008

It appears that the weekly reporting for color, odor, and turbidity were not reported for the first and third weeks of July 2008. An explanation as to why this information was not reported must be provided.

Compliance Schedule Violations

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

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Other Violations

No "other" violations were noted for the reporting period reviewed.

Comments

Termination of Your NPDES Permit – Ohio EPA notes that both outfalls 3IM00016001 and 3IM00016002 have been eliminated, and that you will no longer be discharging to waters of the state that require an NPDES permit. Following installation of the improvements authorized by the February 26, 2010 WWTP Modification PTI, FirstEnergy and Ohio EPA should explore the procedures to terminate the existing NPDES permit.

Notification of Construction Commencement – At least 7 days prior to the commencement of construction authorized by the February 26, 2010 Modification PTI, please notify Ohio EPA's Northeast District Office so that we may have the opportunity to examine construction as time permits.

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,



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

JMS/mt

File: CEI Ashtabula Service Center (Saybrook Twp) Ashtabula Co./Semipublic P/C