



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 4, 2009

RE: RRI ENERGY
AVON LAKE POWER PLANT
PERMIT NO: 3IB00002
LORAIN COUNTY

Mr. Robert W. Laeng
Environmental Safety and Health Coordinator
RRI Energy
33570 Lake Road
Avon Lake, Ohio 44012

Dear Mr. Laeng:

On July 2, 2009, an inspection of the above referenced facility's wastewater treatment system along with the permitted outfalls was conducted. The facility was represented by you.

During the inspection, the following items were noted:

1. The majority of the ash from the facility is hauled to a licensed landfill in Ottawa County by Allied Waste. The remainder of the ash is sold for beneficial reuse. Flyash Direct brokers some of this material for beneficial reuse purposes.
2. There was no discharge at outfall 3IB00002002.
3. Outfall 3IB00002004 was discharging. No visual impact/oil sheen was observed at the discharge point.
4. Duke Sanitary Services pumps out the treatment ponds if a large amount of oil is captured.
5. The following actions are still being implemented to the reduce the level of suspended solids in the discharge:
 - i. The primary ash pond is dredged 1/week.
 - ii. Jersey barriers are placed in front of the ash pond to prevent ash dredgings from being washed back into the pond
 - iii. The secondary ash pond is dredged 1/month.
6. The coal pile was last dredged in approximately September 2005. The next dredging date is estimated to be in late 2009. The sludge is going to be placed in geotextile bags and then shipped to a landfill.
7. The level in the coal pile retention pond is pumped down to 5 feet below the overflow level or when heavy rain is forecast.
8. The facility has 3 ash filters and 4 oily filters. The facility intends to replace six of them by the end of summer. Four of the six have been replaced so far. The remaining one was rebuilt two years ago.
9. Twenty-five white Amur were placed in the oily pond to consume the aquatic vegetation.

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This office has recently reviewed your self-monitoring reports covering the period September 1, 2007 through July 31, 2009 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
610	00530	Total Suspended Solids	1D Conc	50	52.	12/1/2007

FREQUENCY VIOLATIONS

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
610	00530	Total Suspended Solids	1/Week	1	0	09/01/2007
610	00400	pH	1/Week	1	0	09/01/2007
610	00530	Total Suspended Solids	1/Week	1	0	09/15/2007
610	00400	pH	1/Week	1	0	09/15/2007
610	00530	Total Suspended Solids	1/Week	1	0	09/22/2007
610	00400	pH	1/Week	1	0	09/22/2007
610	00530	Total Suspended Solids	1/Week	1	0	10/01/2007
610	00400	pH	1/Week	1	0	10/01/2007
610	00530	Total Suspended Solids	1/Week	1	0	10/08/2007
610	00400	pH	1/Week	1	0	10/08/2007
610	00530	Total Suspended Solids	1/Week	1	0	11/01/2007
610	00400	pH	1/Week	1	0	11/01/2007
610	00530	Total Suspended Solids	1/Week	1	0	05/15/2008
610	00400	pH	1/Week	1	0	05/15/2008

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