



State of Ohio Environmental Protection Agency

Northeast District Office

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

October 10, 2007

RE: ORION POWER MIDWEST, L.P.
AVON LAKE POWER PLANT
PERMIT NO: 3IB00002
LORAIN COUNTY

Mr. Robert W. Laeng
Environmental Safety and Health Coordinator
Orion Power Midwest, L.P.
33570 Lake Road
Avon Lake, OH 44012

Dear Mr. Laeng:

On September 11, 2007, an inspection of the above referenced facility's wastewater treatment system was conducted. The facility was represented by you.

During the inspection, the following items were noted:

1. Most of the ash from the facility is hauled to a licensed landfill in Ottawa County by Allied Waste.
2. Some ash is sold for beneficial reuse. Flyash Direct brokers some of this material for beneficial reuse purposes.
3. There was no discharge at outfall 3IB00002002 and 3IB00002004.
4. C&K Industrial will pump out the ponds if a large amount of oil is captured in the pond.
5. As part of a corrective action for a total suspended violation which occurred in April 2005 the following actions are still being implemented:
 - i. The primary ash pond is now dredged 1/week.
 - ii. Jersey barriers were placed in front of the ash pond to prevent ash dredgings from being washed back into the pond
 - iii. The secondary ash pond is now dredged 1/month.
6. The coal pile was dredged in approximately September 2005. The next dredging date is estimated to be in 2010.
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. The pumps are capable of pumping the coal pile down to 7 feet from the bottom of the pond.
8. The facility has 3 ash filters and 4 oily filters. The facility is proposing to replace 1 oily filter and 1 ash filter per year.
9. Filter media bags were observed broken open around the ash/oil building. This material needs to be cleaned up and properly stored.

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This office has recently reviewed your self-monitoring reports covering the period February 1, 2006, through August 31, 2007, 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:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
611	00530	Total Suspended Solids	30D Qty	0.5	.50719	2/1/2006
610	00530	Total Suspended Solids	1D Qty	8.7	10.0491	3/15/2006
004	61942	pH, Minimum	1D Conc	6.0	5.	6/1/2006
611	00530	Total Suspended Solids	30D Qty	0.5	5.62703	6/1/2006
611	00530	Total Suspended Solids	1D Qty	1.8	10.4087	6/12/2006
002	61941	pH, Maximum	1D Conc	9.0	9.03	6/17/2006
002	61942	pH, Minimum	1D Conc	6.0	5.45	6/18/2006
002	61941	pH, Maximum	1D Conc	9.0	9.55	6/21/2006
002	61942	pH, Minimum	1D Conc	6.0	5.98	6/22/2006
611	00530	Total Suspended Solids	1D Qty	1.8	4.92807	6/25/2006
611	00530	Total Suspended Solids	30D Conc	30	40.6666	7/1/2006
611	00530	Total Suspended Solids	30D Qty	0.5	22.0236	7/1/2006
611	00530	Total Suspended Solids	1D Qty	1.8	2.89553	7/3/2006
611	00530	Total Suspended Solids	1D Qty	1.8	18.8909	7/9/2006
611	00530	Total Suspended Solids	1D Qty	1.8	44.2845	7/19/2006
004	61942	pH, Minimum	1D Conc	6.0	3.	8/10/2006
610	00530	Total Suspended Solids	1D Conc	50	56.	1/7/2007
004	61941	pH, Maximum	1D Conc	9.0	12.	7/2/2007

Please inform this office in writing, within 21 days receipt of this letter, the reasons for the above referenced violations as well as what actions are going to be taken to correct item 9. The letter should include dates either actual or proposed for completion of the action.

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