



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 1, 2009

RE: WAYNE COUNTY
ORRVILLE POWER PLANT
NPDES 31B00017

Mr. Jeff Brediger
Director of Utilities
City of Orrville
P.O. Box 107
1100 Perry Street
Orrville, Ohio 44667

Dear Mr. Brediger:

On August 21, 2009, this writer met with you, Mr. Paul Skidmore, and Mr. Dean Kallenborn to conduct an inspection of the industrial operations at the above address. The intent of the inspection was to gather information required to process the National Pollutant Discharge Elimination System Permit (NPDES) modification as requested by the facility. The following is a summary of the inspection, compliance history and review of the NPDES modification application.

According to Agency records, the Orrville Municipal Power Plant produces 72 Mega Watts of electricity to a service area of approximately 125 square miles. The power plant uses coal to fire the boilers at a rate of approximately 200,000 tons/year. The facility utilizes seven cooling towers and the cooling water used is supplied by one groundwater well, city potable water from the power plant treatment system and the city wastewater treatment plant effluent.

NPDES MODIFICATION

The facility is requesting a modification to the NPDES permit to eliminate the internal monitoring at outfall 605 and the downstream-nearfield monitoring at outfall 905.

The limits in the facility's NPDES permit were going to be unattainable and therefore the facility determined to install a sanitary sewer extension to tie in the discharge from internal monitoring station 605 to the City of Orrville Wastewater Treatment Plant. The sanitary sewer extension, installed under Ohio EPA PTI No. 657598, was effective October 10, 2008. This new connection was installed in April 2009 and all process wastewater discharges to the unnamed tributary to Little Chippewa Creek from outfall 605 have been discontinued. You have requested outfall 905 be eliminated since the discharges at outfall 605 have been eliminated.

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Because all discharges from this internal monitoring station have been tied into the Orrville Wastewater Treatment Plant effluent, this office has no objection to eliminating outfall 605 and outfall 905 from the NPDES permit.

WASTEWATER GENERATED

Wastewater is generated on site from the storm water runoff at the coal pile runoff and storm water is collected in areas of the plant associated with the delivery of coal and fly ash collection. In addition, wastewater is generated from storm water collected in the Main Transformer Yard and the Cooling Tower Transformer Area. Concrete pads with trench drains have been installed in these areas to collect and convey the storm water to the plant's wastewater treatment system.

The water softener backwash water is a source of wastewater at the facility that is discharged to the plant's wastewater treatment system. The power plant wastewater from sumps under turbines #9, #10 and #11 returns back to the plant's wastewater treatment plant. It is understood the wastewater from these sumps consist of floor washing, valve and pump packing leaks, air compressor moisture separator drips, turbine seal leaks, and other miscellaneous waters falling onto the plant floor. The boiler blowdown is the final wastewater generated at the site.

All of the wastewater on the site (except the cooling tower blowdown) is collected and treated at the wastewater treatment plant located on site. The wastewater treatment system has a 100 gpm average design flow and 150 4gpm peak design flow. The treatment consists of two equalization basins with an overflow to the Orrville Wastewater Treatment Plant, oil water separator, pH adjustment, polymer addition, sodium bisulfate addition, Lamella clarifiers, dechlorination and sludge filter press. The cooling tower blowdown water is not provided with any treatment.

COMPLIANCE SUMMARY:

A summary of wastewater treatment plant discharge and frequency violations for the period of July 1, 2007 through August 1, 2009 has been attached to this letter. Please review all plant data to ensure the violations are accurate. Any reporting errors or eDMR errors must be reported to the Ohio EPA so the error can be resolved. You may contact this office or Mr. James Roberts of this Agency's Central Office at (614) 644-2054 to discuss this issue directly.

INSPECTION SUMMARY:

Below are the findings and recommendations from the inspection:

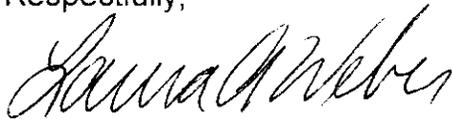
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- 1) The berms around the coal pile runoff area were disturbed and a recent rainfall event caused an area of the coal pile runoff to spill over into the storm water drain for outfall 007. The separation between the coal pile storage area and the storm water drainage area for outfall 007 must be maintained. It is understood this work was to be completed immediately after the inspection.
- 2) As noted in previous inspections by this office, an oily residue was observed on the ground located on the east wall of the building. It is understood any runoff is contained in the trench drain on this side of the building and the contaminated soils are periodically removed.

The NPDES permit modification for this facility is being drafted and will be public noticed in the near future. You will have 30 days from the date of the public notice to submit comments to the Ohio EPA regarding the draft permit.

Should you have any comments or questions regarding this letter, please contact this office at (330)963-1299.

Respectfully,



Laura A. Weber, P.E.
Environmental Engineer
Division of Surface Water

LAW/mt

pc: Paul Skidmore, Orrville Utilities
Ken Eng, Wayne County Health Department

File: Industrial Permit/Compliance/Orrville Light & Power

Discharge Monitoring Violations:

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September2007	006	Chlorine, Total Residu	30DConc	0.011	.025	9/1/2007
September2007	006	Chlorine, Total Residu	1D Conc	0.019	.2	9/25/2007
September2007	605	Copper, Total (Cu)	30DConc	29	37.	9/1/2007
November 2007	906	Water Temperature	30DConc	16.7	21.	11/1/2007
November 2007	906	Water Temperature	1D Conc	19.4	22.	11/6/2007
November 2007	906	Water Temperature	1D Conc	19.4	22.	11/13/2007
November 2007	906	Water Temperature	1D Conc	19.4	21.	11/20/2007
April 2008	906	Water Temperature	1D Conc	19.4	21.	4/1/2008
April 2008	906	Water Temperature	30DConc	16.7	20.5	4/1/2008
April 2008	906	Water Temperature	1D Conc	19.4	20.	4/8/2008
April 2008	906	Water Temperature	1D Conc	19.4	23.	4/22/2008
November 2008	906	Water Temperature	30DConc	16.7	17.	11/1/2008
November 2008	906	Water Temperature	1D Conc	19.4	20.	11/4/2008

Frequency Violations:

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
July 2007	006	Chlorine, Total Residu	2/Week	2	0	07/01/2007
July 2007	006	Chlorine, Total Residu	2/Week	2	0	07/08/2007
July 2007	006	Chlorine, Total Residu	2/Week	2	0	07/15/2007
July 2007	006	Chlorine, Total Residu	2/Week	2	0	07/22/2007