

**Environmental
Protection Agency**

Governor
Lt. Governor
Director

October 7, 2011

RE: WESTWOOD ASH FACILITY
PERMIT NO. 3IN00224
LORAIN COUNTY
EATON TOWNSHIP

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

Dear Mr. Brown:

On September 14, 2011, an inspection of the above referenced facility was conducted. The facility was represented by Mr. Carl Ceceris, Ms. Kristin Yanko, Ms. Cindy Moriarity and you. The purpose of the inspection was to: (1) evaluate the performance of the storm water detention basin along the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

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

1. The facility has been inactive since approximately 1998,
2. Ash is currently being taken to Red Bud,
3. The Westwood facility was originally built for the CEI Avon Lake facility,
4. The facility was only used for approximately one year,
5. The current owners are in negotiations to sell the Westwood Ash Facility to GenOn,
6. The facility's permit expires on August 31, 2012,
7. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit the appropriate renewal forms as are required by the Ohio EPA no later than 180 days prior to the above date of expiration. Please note that a \$ 200.00 dollar application renewal fee is required at the time of submission. The check shall be made payable to: "Treasurer, State of Ohio",
8. The Westwood Ash Facility is currently closed. Ohio EPA is willing to work with FirstEnergy to modify the facility's NPDES permit to be more reflective of a permanently closed facility at the time of permit renewal if the request is made.

This office has recently reviewed your self-monitoring reports covering the period July 1, 2006 through August 31, 2011 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:

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Frequency Violations

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	50050	Flow Rate	1/Day	1	0	02/14/2008
001	00530	Total Suspended Solids	1/2Weeks	1	0	03/01/2009
001	00400	pH	1/Week	1	0	03/01/2009
001	00095	Specific Conductance a	1/Week	1	0	03/01/2009
001	50092	Mercury, Total (Low Level)	1/Quarter	1	0	03/01/2009
001	00400	pH	1/Week	1	0	03/08/2009
001	00095	Specific Conductance a	1/Week	1	0	03/08/2009
001	00400	pH	1/Week	1	0	03/22/2009
001	00095	Specific Conductance a	1/Week	1	0	03/22/2009

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

Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS:cs