



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

May 5, 2008

Re: Washington County
Columbus Southern Power-Waterford Plant
Facility ID # 0684000213
Non-HPV Warning Letter

Certified: 70041160000169053070

Mike Zwick
Plant Manager
Columbus Southern Power-Waterford Plant
201 Righteous Ridge Road
Waterford, OH 45786

Subject: Notice of Violation from the Title V Applicable Emissions Limitations and/or Control Requirements

Dear Mr. Zwick:

On February 28, 2008, Ohio EPA, Division of Air Pollution Control received the facility's revised 4th quarter 2007 and 4th Quarter 2007 CEMS Performance Reports required by the Permit-To-Install 06-06739 revised on March 20, 2007. These reports replaced the reports originally submitted on January 25, 2008. The original reports did not correctly report the required information.

The revised 4th quarter 2007 quarterly air permit deviation report, submitted on February 28, 2008, reported a deviation. It was reported that the NO_x control system on emission unit P002 malfunctioned and was not operating for approximately two hours over two separate days in December 2007.

Columbus Southern Power-Waterford Plant exceeded the NO_x applicable emission limitations and/or control requirements of PTI 06-06739, Part III (A)(I)(1) and failed to immediately notify the Ohio Environmental Protection Agency, Southeast District Office in accordance with OAC rule 3745-15-06(B)(1).

In accordance with OAC rule 3745-15-06(B)(1) and Part I(A)(2) of PTI 06-06739, in the event of malfunctions of air pollution equipment that breaks down in such a manner to cause the emissions of air contaminants in violation of any law, the person responsible shall immediately notify the Ohio Environmental Protection Agency, Southeast District Office of such failure or breakdown. The immediate notification shall include the following data:

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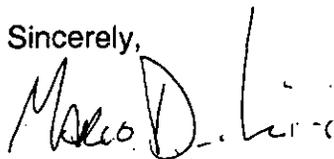
- (a) Identification and location of such equipment including the Ohio environmental protection agency permit application number for each air contaminant source;
- (b) The estimated or actual duration of breakdown;
- (c) The nature and estimated quantity of air contaminants which have been or may be emitted into the ambient air during the breakdown period;

According to Section 6 General Requirements, the permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

Please notify this office immediately in accordance with OAC Rule 3745-15-06(B)(1) and Part I(A)(2) of PTI 06-06739 of any malfunction that results in an exceedence of the terms and conditions of your permit.

Should you have any questions, feel free to contact me at marco.deshaies@epa.state.oh.us or by phone at (740) 380-5255.

Sincerely,



Marco Deshaies
Environmental Specialist
Division of Air Pollution Control

MD/mim