



State of Ohio Environmental Protection Agency

Southeast District Office

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

February 14, 2008

Re: Coshocton County
Conesville Coal Prep. Company
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Randy Miller, Plant Manager
Conesville Coal Preparation Co.
14561 Franklin Township Road 263S
Conesville, Ohio 43811

Dear Mr. Miller:

On February 4, 2007, Ohio EPA conducted a Compliance Evaluation Inspection at the Conesville Coal Preparation Company Facility. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 0IL00073*FD, to evaluate the wastewater treatment systems performance and the permit renewal application. During the inspection, the plant appeared to be operating in compliance.

The following list summarizes violations which have been reported since the effective date of the existing permit on July 1, 2003:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	80082	CBOD 5 day	1D Conc	15	25.3	10/4/2006
002	00530	Total Suspended Solids	1D Conc	18	20.	10/3/2007
002	00530	Total Suspended Solids	1D Conc	18	24.	10/17/2007
002	00530	Total Suspended Solids	30D Conc	12	22.	10/1/2007
002	80082	CBOD 5 day	1D Conc	15	19.4	10/3/2007
002	80082	CBOD 5 day	30D Conc	10	12.9	10/1/2007

The above reported violations occurred at outfall 002 for to the sanitary package treatment plant.

Many recently reported CBOD₅ and TSS results have been coded with AA indicating that the parameter was not detected or it was detected below the minimum detection level. In the event this code is used the detection limit should be reported in the additional remarks section of the monthly operating report.

Also while reviewing received Monthly Operating Report data, we noticed that TSS for outfall 001 has been reported at 10 mg/L since April 17, 2006 accounting for 40 separate sampling events. We recommend the facility have their contracted laboratories review their testing procedures. We would also like to share that CBOD₅ tests shall have a minimum depletion of 2.0 mg/L and 1.0 mg/L residual according to Standard Methods. Special attention should be placed on ensuring adequate pH range, dechlorination, and the use of a nitrification inhibitor with CBOD samples.

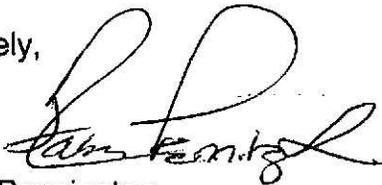
One item that needed addressed was the calibration of the flow meter which should be completed at least annually if not more frequent based on manufacturer's recommendation. We ask that a log be maintained with calibration dates, etc. preferably in close proximity to the meter for review during site inspections.

During the inspection, we noticed the weirs have recently been replaced at the clarifier and appear well maintained. Sludge levels in the acid mine drainage lagoons also appear to be well maintained. Additionally the sand bed filters at the sanitary plant are being well kept.

The NPDES permit renewal application is currently being reviewed. Additional testing is to be required to complete Form 2.C of the application as was discussed with Mark Stammen who was onsite for the inspection. The renewal will likely have new requirements which will require a class A wastewater operators license for the sanitary package plant (Dave indicated he had a Class III which is more than adequate), some modification of existing outfall signage, and some low-level mercury monitoring.

A copy of our inspection report is enclosed. The assistance and cooperation received during the inspection was appreciated. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AMP/dh

Enclosure

c: Dave DeVault, Operations Supervisor, Conesville Coal Preparation Company
c: Mark Stammen, AEP

**NPDES
Compliance Inspection Report**

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IL00073*FD	OH0076368	2/4/08	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Conesville Coal Preparation Company 14561 Franklin Township Road 263S Conesville, OH 43811	~10:00 A.M	July 1, 2003
	Exit Time	Permit Expiration Date
	~12:15 P.M.	June 30, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Dave DeVault, Operations Supervisor	740-829-4146
Mark Stammen, Env. Sp. IV	614-716-1541
Name, Address and Title of Responsible Official	Phone Number
Randy Miller, Plant Manager 14561 Franklin Township Road 263S Conesville, OH 43811	

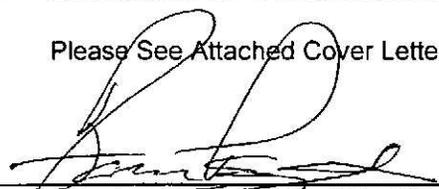
C. AREAS EVALUATED DURING INSPECTION

<u>S</u> Permit	<u>M</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>S</u> Compliance Schedules
<u>S</u> Operations & Maintenance	<u>S</u> Effluent/Receiving Waters	<u>S</u> Self-Monitoring Program
<u>S</u> Facility Site Review	<u>N</u> Sludge Storage/Disposal	<u> </u> Other
<u>N</u> Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

Please See Attached Cover Letter.



 Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

2-11-08

 Date



 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

2-11-08

 Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product(s) and production rates conform with permit application (industries)			X	
d. Flows and loadings conform with NPDES permit			X	
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection	X ¹			
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted	X			
i. Number and location of discharge points are as described in permit	X			

^{c1}Dechlorination was installed May 8, 2006 per PTI No. 06-7869.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection		X		
b. Permittee is taking actions to resolve violations			X	
c. Permittee has compliance schedule		X ¹		
d. Compliance schedule contained in:			X	
e. Permittee is meeting compliance schedule			X	

¹Compliance schedule in permit has been completed with the installation of the dechlorination.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator Dual Feed				X
b. Adequate alarm system available for power or equipment failures				X
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: 2 shifts 7 Days/Week 29 employees	X			
e. Operator holds unexpired license of class required by permit Class:			X ¹	
f. Routine and preventive maintenance schedule/performed on time				X
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained				X
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses: on MORS 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection	X ²			

¹New permit will require a Class A Operators license for the Sanitary WWTP. Current staff maintains a Class III which would meet the new permit requirement for a Class A.

²January 5, 2005 an overflow of Pond #1 was reported to this office with an approximate flow of 1500 gpm during a rainfall in excess of 2.25 inches in a 24 hour period.

H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): _____ Submitted Date
 _____ Approval Number
 _____ Not submitted
 _____ X _____ N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current				X
c. Sludge adequately disposed (Method:)				X
d. If sludge is incinerated, where is ash disposed of?				X
e. Is sludge disposal contracted (Name:)				X
f. Has amount of sludge generated changed significantly since last inspection				X
g. Adequate sludge storage provided at plant				X
h. Land application sites monitored and inspected per SMP				X
i. Records kept in accordance with state and federal law				X
j. Any complaints received in last year regarding sludge				X
k. Is sludge adequately processed (digestion, dewatering, pathogen control)				X

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: <input checked="" type="checkbox"/> ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other _____ ultrasonic & weir _____ Specify:	X			
b. Calibration frequency adequate (date of last calibration:)		X ¹		
c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained			X	
d. Flow measurement equipment adequate to handle expected ranges of flows		X ²		
e. Actual flow discharged is measured		X ³		
f. Flow measuring equipment inspection frequency: _____ Daily _____ Weekly _____ Monthly _____ Other				

¹Flow meter calibration should be completed at least annually if not more frequent based on manufacturer's recommendation. A log should be maintained with calibration dates, etc preferably in close proximity to the meter for review during inspections.

²Flow is measured up to 1,000gpm. Some large rain events can lead to flows above 1000gpm.

³Flow is measured prior to pH adjusting to provide dosage control. Design of treatment for 001 is for flow through by gravity which would typically see flow in as flow out.

Part 2 - Sampling	Yes	No	N/A	N/E
a. Sampling location(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate	X			
i. Samples refrigerated during compositing			X	
ii. Proper preservation techniques used				X
Conform with 40 CFR 136.3				X
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			X

Part 3, Laboratory - General	Yes	No	N/A	N/E
a. EPA approved analytical testing procedures used (40 CFR 136.3)				X
b. If alternate analytical procedures are used, proper approval has been obtained			X	
c. Analyses being performed more frequently than required by permit				X
d. If (c) is yes, are results reported in permittee's self-monitoring report				X
e. Commercial laboratory used 001. Typically performed by Dolan Environmental minus the pH, Temp, etc. 002. Typically performed by TCCI -	X			

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	none	none	none	none	none	clear	
002	none	none	none	none	none	clear	

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors				X
c. Do you notice distressed (unhealthy, discolored, dead) vegetation				X
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities				X