



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

July 9, 2009

Re: Coshocton County
CSP Conesville FGD Facility
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Mark Borman, Plant Manager
Columbus Southern Power Company
Conesville Generating Station
47201 C.R. 273
Conesville, Ohio 43811

Dear Mr. Borman:

On June 16, 2009, Ohio EPA conducted a Compliance Evaluation Inspection at the Columbus Southern Power Company Conesville FGD Facility. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 0IN00101*FD.

The following list summarizes numeric violations which have been reported through Discharge Monitoring Reports since September 2006:

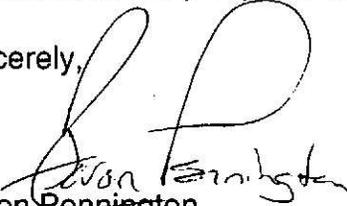
Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.5	6.1	12/1/2008

On December 4, 2008, we received a written letter which explained that CO₂ had accidentally been over-allocated. The incident was promptly corrected.

We understand that the lateral expansion of the landfill will include two new leachate lines to the existing basins for treatment before final outfall at either 001 or 002. Additionally, there may be an underdrain necessitated by the expansion. In a letter dated February 4, 2009 from Dana Limes of AEP, the addition of a 604 and 605 was mentioned to the NPDES permit. Depending on the timeframe for the inclusion of these new point sources, the NPDES permit may need to be modified if they will occur before the expiration date of August 31, 2011. Otherwise the new internal outfalls and underdrains can be accounted for in the renewal application.

A copy of our inspection report is enclosed. If you have any questions, please feel free to contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
District Representative
Division of Surface Water

AP/dh

Enclosure

- c: Gigi Hammond, AEP
- c: Mark Stammen, AEP

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IN00101*FD	OH0076627	June 16, 2009	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Columbus Southern Power Company Conesville FGD Waste Disposal Facility New Intersection of SR 83 and CR 275 Franklin Twp., Coshocton County, Ohio	9:30 a.m.	September 1, 2006
	Exit Time	Permit Expiration Date
	11:00 a.m.	August 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Gigi Hammond, Env. Coordinator	(740) 829-4065
Mark Stammen, Env. Spec. IV	(614) 716-1541
Shane Mender	
Chet Vance	
Name, Address and Title of Responsible Official	Phone Number
Mark Borman, Plant Manager	

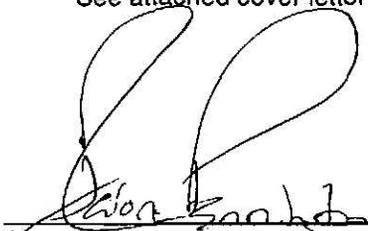
C. AREAS EVALUATED DURING INSPECTION

<u> S </u> Permit	<u> S </u> Flow Measurement	<u> N/A </u> Pretreatment
<u> N </u> Records/Reports	<u> S </u> Laboratory	<u> N/A </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/A </u> Sludge Storage/Disposal	<u> </u> Other
<u> N/A </u> Collection System		

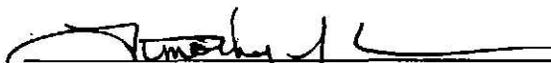
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated; N/A = Not Applicable)

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

See attached cover letter.


 Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

7-8-09
 Date


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

7/8/09
 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		
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			

Comments: There is a lateral expansion project that looks to include two new leachate lines to the existing ponds, the open face would not increase. Additionally, new underdrains may also be included in project.

003 had a North and South pipe designation (two pipes for one discharge)

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		
d. Compliance schedule contained in: _____			X	
e. Permittee is meeting compliance schedule			X	

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: No. of shifts: _____ Days/Week: _____			X	
e. Operator holds unexpired license of class required by permit Class: <u>N/A</u>			X	
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 No.			X	
k. Any hydraulic and/or organic overloads experienced since last inspection			X	

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	Clear	Remnants	None	Clear	
002	None	None	Clear	None	None	Clear	
003 - N							No flow
003 - S	None	None	Clear	None	None	Clear	Trickle
004	None	None	Clear	None	None	Clear	
005	None	None	Clear	None	None	Clear	
006	None	None	Red precipitant	None	None	Clear	
601	None	None	Clear	None	None	Clear	
602	None	None	Clear	None	None	Clear	
603	None	None	Clear	None	None	Clear	Trickle