



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

July 31, 2007

**Re:** Jefferson County  
First Energy - W.H. Sammis Plant  
Compliance Evaluation Inspection  
Correspondence (IWW)

Mr. Frank Lubich, Director  
First Energy - W.H. Sammis Plant  
P.O. Box 176  
Stratton, Ohio 43961

Dear Mr. Lubich:

On July 24, 2007, Ohio EPA conducted a Compliance Evaluation Inspection at the W.H. Sammis Plant. The purpose of the inspection was to determine compliance with terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 01B00010\*LD and to evaluate the wastewater treatment systems performance. Overall the plant appeared to be operating in compliance.

The following list summarize violations which have occurred since the previous inspection on October 17, 2005:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
009	01079	Silver, Total Recoverable	1D Conc	5	29.	11/08/06
009	01079	Silver, Total Recoverable	1D Qty	.17	.7486	11/08/06
009	01079	Silver, Total Recoverable	1D Conc	5	5.7	12/01/06
009	01079	Silver, Total Recoverable	1D Conc	5	11.	12/22/06
009	01079	Silver, Total Recoverable	1D Qty	.17	.27895	12/22/06
009	01079	Silver, Total Recoverable	1D Conc	5	7.6	01/02/07
009	01079	Silver, Total Recoverable	1D Qty	.17	.18151	01/02/07
009	01079	Silver, Total Recoverable	1D Conc	5	7.4	01/08/07
09	01079	Silver, Total Recoverable	1D Qty	.17	.18122	01/08/07
009	01079	Silver, Total Recoverable	1D Conc	5	7.2	01/15/07
009	01079	Silver, Total Recoverable	1D Qty	.17	.17196	01/15/07
009	01079	Silver, Total Recoverable	1D Conc	5	14.4	01/22/07
009	01079	Silver, Total Recoverable	1D Qty	.17	.36518	01/22/07

Many non-detection samples have been reported since the most recent violation. A compliance schedule within the effective permit addresses silver at outfall 009. Please respond with an explanation for the reported violations along with also addressing those actions which appear to currently be employed to avoid future violations.

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,

A handwritten signature in black ink, appearing to read "Aaron Pennington" with a stylized flourish at the end.

Aaron Pennington  
District Representative  
Division of Surface Water

AMP/dh

Enclosure

- c: Eric Goerss, Engineer, Technical Services, First Energy, W.H. Sammis Plant
- c: Scott F. Brown, P.E. Engineer, First Energy, Environmental Department

**NPDES**  
Compliance Inspection Report

**A. NATIONAL DATA SYSTEM CODING**

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIB00010*LD	OH00111525	July 24, 2007	C	S	2

**B. FACILITY DATA**

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
First Energy Corp. Ohio Edison Co. – W.H. Sammis Plant State Route 7 Stratton, OH 43961-0176	10:30 A.M.	August 1, 2003
	Exit Time	Permit Expiration Date
	2:00 P.M.	October 31, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Scott F. Brown, Engineer – Environmental Department	330-384-4643
Eric D. Goerss, Engineer – Technical Services	740-537-6390
Name, Address and Title of Responsible Official	Phone Number
Frank Lubich, Director Ohio Edison –W.H. Sammis Plant PO Box 176 Stratton, OH 43961	740-537-1546

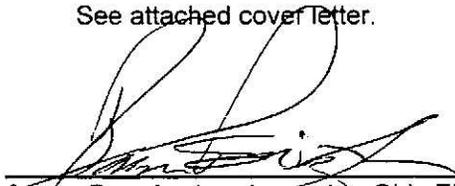
**C. AREAS EVALUATED DURING INSPECTION**

<u>S</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>N</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>N</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)

See attached cover letter.

  
Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

7-27-07  
Date

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

7/27/07  
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:** Work on AQC project has commenced with foundations for stack and adsorbers being poured.

**F. COMPLIANCE SCHEDULES/VIOLATIONS**

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

**Comments:** <sup>1</sup>There have been reported silver violations at 009. However many non detection results have been reported in between the silver violations.

**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:	X			
e. Operator holds unexpired license of class required by permit Class:			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 Number				X
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

**Comments:**

**H. 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 <input checked="" type="checkbox"/> calculated from influent <input type="checkbox"/> weir <input type="checkbox"/> Other <input type="checkbox"/> ultrasonic & weir <input type="checkbox"/> Specify:	X			
b.	Calibration frequency adequate - Quarterly	X			
c.	Secondary instruments (totalizers, recorders etc.) properly operated and				X
d.	Flow measurement equipment adequate to handle expected ranges of flows	X			
e.	Actual flow discharged is measured	X			
f.	Flow measuring equipment inspection frequency: <input checked="" type="checkbox"/> Daily <input type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> Other				

Comments:

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

Comments:

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 1. Parameters analyzed by commercial lab: Hg- LL, CBOD, Fecal Coliform, metals  2. Lab name: Jones & Henry Laboratories, Inc.(Hg- LL) CMA Environmental Labs (CBOD, Fecals) First Energy Labs (metals)	X			

Comments:

I. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	none	none	N/A	none	none	N/A	
009	none	none	clear	none	none	clear	
011	none	none	clear	none	none	clear	
012	N/A	N/A	N/A	N/A	N/A	N/A	
013	none	none	clear	none	none	clear	
602	none	none	clear	none	none	clear	
604	none	none	clear	none	none	clear	
605	N/A	N/A	N/A	N/A	N/A	N/A	
606	none	none	clear	none	none	clear	
607	none	none	clear	none	none	clear	
800	none	none	slight	none	None – debris accumulating in river	Light green	

Comments: