



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 18, 2012

RE: ASHTABULA CO. PORT AUTHORITY POWER
PLANT (FKA FIRSTENERGY, CEI PLANT C)
NPDES PERMIT NO. 31B00021
ASHTABULA TWP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Sean Ratican, President
Ashtabula County Port Authority
17 North Market Street
Jefferson, OH 44047

Dear Mr. Ratican:

On June 14, 2012, a site inspection was conducted at the above referenced facility at 2715 Lake Road East (State Route 531), Ashtabula Township, Ashtabula County. The inspection was conducted by John Schmidt of this office. Robert Carlo, Wastewater Operator at Praxair and Jason Gyraht, Plant Engineer at Praxair, and you represented the Ashtabula County Port Authority. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last inspection was conducted on September 7, 2012.

The site is known as the former FirstEnergy, Ohio Edison Plant C, Cleveland Electric and Illuminating Co. (CEI) and Union Carbide Power Plant, is an inactive coal burning power plant that is currently used as a lake water treatment and industrial water distribution system. Currently, the only outfall is Outfall 007, which is the outfall from the water treatment system. Treatment includes screening, oil/water separation, sedimentation, anthracite filtration, and final discharge. Waters that are treated are limited to pump seal water, anthracite filter backwash, and runoff from the building roof and floor drains located throughout the facility, and surface water runoff in vicinity of a 500,000 gallon seal water sump/equalization basin. The design flow of the water treatment systems is 1.43 MGD, with an average daily flow of 0.123 MGD.

Observations

Following are observations made during the inspection.

1. The general operation and maintenance of the wastewater treatment system and storm water collection system appeared to be satisfactory.
2. Outfall 007 was observed to be not discharging. The system is only used when the 500,000 gallon basin requires pumping down. The design flow of the water treatment system is 1.43 MGD. The composite samplers are no longer used, as all samples specified in the NPDES permit are grab samples.

3. The Port Authority pumps approximately 15 MGD of raw lake water to existing businesses in the area that were once a part of the Union Carbide Complex. These businesses include Praxair, USALCO, EMC Metals, (fka Elkem Metals), ESAB Welding Products, ASHTA Chemicals, and Cristal Global – Millennium Inorganic Chemicals.
4. The Port Authority supplies 8.5 MGD to Praxair. The remaining water goes to Millennium-Crystal Global, ESAB Welding Products, and ASHTA Chemicals. The Port Authority also supplies water to the local fire hydrant system. Millennium uses its water for process water and sanitary, Praxair and ESAB Welding use water for non-contact cooling water, limited sanitary, and a fire water loop purposes, and ASHTA and the Port Authority Plant C use the water for limited sanitary and fire water loop purposes,
5. Praxair performs the NPDES permit sampling on behalf of the Port Authority. Praxair also collects and performs the pH sampling at the facility.
6. The EA Group provides Praxair with the sample containers with preservative, and performs laboratory analysis for all parameters except flow rate and pH. Records of pH meter calibration is also maintained by Praxair.
7. Storm water collected in catch basins in the parking areas of the former power plant discharge directly to Lake Erie.
8. The ash pond has been closed under a grant from the Clean Ohio Redevelopment Fund (CORF) grant program as a part of larger renovations at the facility. The pond has had its contents removed and the pond partially backfilled with clean sand, and the outfall from the ash pond has been removed from the permit (former Outfall 004). The ash pond was observed as containing clear storm water. The material in the ash pond was tested and disposed in a landfill.
9. A log book of repairs and observations is maintained at the facility. Praxair personnel perform routine observations, monitor the facility, and perform the sampling (flow readings, and pH). Praxair prepares the electronic discharge monitoring report (eDMR) and submits of the eDMR through Ohio EPA's Web-based application on behalf of the Ashtabula County Port Authority.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period August 1, 2011 through May 1, 2012, indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

No effluent limit violations were noted for the period reviewed.

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Reporting Violations

Ashtabula County Port Authority has not been timely in reporting required data to Ohio EPA as prescribed by your NPDES permit. Part III, Item 4 of your permit requires that data for the previous month to be reported to Ohio EPA either electronically by the 20th of each month or in paper form by the 15th of each month. Data for 2011 was not submitted into the eDMR system until June 13, 2012. Future electronic submittals must be completed by the 20th of each month for the previous month's required monitoring, and a report must be filed even if no discharges occurred over a particular month.

Compliance Schedule Violations

Your current NPDES permit does not contain a compliance schedule.

Other NPDES Violations

Your current NPDES permit expires on July 31, 2012. Page 1 of your NPDES permit states that in order to receive authorization to discharge beyond the date of expiration (July 31, 2012), the permittee shall submit such information and forms as are required by the Ohio EPA no later than 180 days prior to the date of expiration. Ashtabula County Port Authority has indicated that they are currently preparing a renewal application. Please submit this renewal as soon as possible.

Comments

Ohio EPA offers the following comment

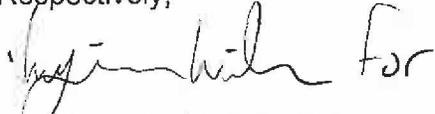
Proposed Elimination of Seal Water Sump: During the 2010 CEI inspection, the Ashtabula County Port Authority and Praxair inquired about the elimination of the equalization basin known as the seal water sump, a 500,000 gallon basin that once was designed to hold water from the steam turbines when the facility operated as a powerhouse. Ashtabula County Port Authority and Praxair examined the feasibility of eliminating this basin and routing the roof storm water runoff as storm water and managing only the treatment system backwash and seal water through the water treatment system. Ohio EPA understands that there are currently no plans to implement the separation. It was discussed that there is an existing concrete sump inside the building to hold the seal water and that backflow preventers or other instrumentation could be used to prevent untreated backwash or seal water from entering Lake Erie through one of the pump intake lines. Ohio EPA will still need to be assured that the seal water, floor drains, and any backwash water generated is properly treated and not merely circulated through the raw water distribution system. The proposal will require a permit to install (PTI) application to close the existing 500,000 gallon basin and a rubber-lined basin, as well as to perform necessary piping changes. The closure plan must include measures to sample and properly dispose of any accumulated materials in the bottom of any basin, and to bring each basin to grade. The Ashtabula County Port Authority and Praxair may not implement any of the referenced improvements until they have received an approved PTI.

Conversion of Individual NPDES Permit to General NPDES Permit: During the inspection, we discussed converting the existing NPDES permit into a general NPDES permit. In checking Ohio EPA's available general permits online (http://www.epa.ohio.gov/dsw/permits/gpfact.aspx#currently_available), there does not appear to be a general permit that would capture all industrial discharges from this facility (industrial storm water, oil-water separator, and anthracite filter backwash). Ohio EPA is currently exploring adding additional general permits, and we can revisit this issue at a later date.

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If you have any questions or comments regarding this inspection, please feel free to contact me at
(330) 963-1175.

Respectively,

A handwritten signature in cursive script, appearing to read "John M. Schmidt For".

John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS:bo

pc: Tim Honkala, Plant Manager, Praxair

File: Industrial/Ashtabula County Port Authority- Plant C/PC