



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Scott J. Nally, Director

March 28, 2013

**Re:** Jefferson County  
 Riddles Run Refuse Disposal/  
 Coal Processing Plant  
 0IL00146\*AD  
 Compliance Evaluation Insp.  
 Correspondence (IWW)

Mr. Stan Piasecki, Vice President/General Manager  
 OhioAmerican Energy, Inc.  
 34 Kelley Way  
 Brilliant, Ohio 43913

Dear Mr. Piasecki:

On February 26, 2013, Ohio EPA conducted a Compliance Evaluation Inspection at the OhioAmerican Energy, Inc. Riddles Run Refuse Disposal/Coal Processing Plant in Jefferson County. The purpose of the inspection was to determine compliance with the NPDES permit. Jon Nagel and Mike Kelley from OhioAmerican Energy accompanied me during the inspection. I noted that the facility has now implemented pH adjustment for metal precipitation at outfall 001 with use of KMnO<sub>4</sub> and NaOH in addition to soda ash. Dosage is provided using a weir and dosing wheel. The outfalls were noted clear with no signs of metal precipitation occurring in receiving waters. The pH adjustments and associated settling ponds appear to be effective. This facility overall, appeared to be operating in compliance with the NPDES permit during the inspection.

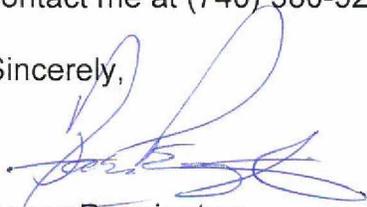
I reviewed the data submitted from June 2011 through February 2013. That timeframe contained the following limit violations.

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00400	pH	1D Conc	6.0	3.92	9/4/2012
001	00400	pH	1D Conc	6.0	3.01	9/5/2012
001	00400	pH	1D Conc	6.0	3.34	9/6/2012
001	00400	pH	1D Conc	6.0	3.74	9/7/2012
001	00400	pH	1D Conc	6.0	4.48	9/8/2012
001	00400	pH	1D Conc	6.0	3.9	9/9/2012
001	00400	pH	1D Conc	6.0	4.35	9/10/2012
001	00400	pH	1D Conc	6.0	3.95	9/19/2012
001	00400	pH	1D Conc	6.0	4.5	10/30/2012
001	00400	pH	1D Conc	6.0	5.5	10/31/2012

Non-compliance notifications were received for the above listed violations. No violations have been reported since October 2012.

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 blue ink, appearing to read 'Aaron Pennington', is written over the word 'Sincerely,'.

Aaron Pennington  
District Representative  
Division of Surface Water

AP/dh

Enclosure

c: Jon Nagel, Coord. of Env. Compliance, OhioAmerican Energy, Inc.



State of Ohio Environmental Protection Agency  
Southeast District Office

Industrial NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES #	Month/Day/Year	Inspection Type	Inspector	Facility Type
0IL00146*AD	OH0135411	February 26, 2013	CEI	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
OhioAmerican Energy, Inc. Riddles Run Refuse/Coal Processing Plant Wells Township Road 263 approx. 0.9 miles SE of int. w/SR 151	10:15 a.m.	February 13, 2008
	Exit Time	Permit Expiration Date
	12:20 p.m.	February 28, 2013
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)	
Jon Nagel, Coordinator of Environmental Compliance Mike Kelley		
Name, Address, and Title of Responsible Official	Phone Number	
Stan Piasecki, Vice President/General Manager		

Section C: Areas Evaluated During Inspection					
(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)					
S	Permit	S	Flow Measurement	N/A	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedules
S	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	N/A	Sludge Storage/Disposal		Other
N/A	Collection System				

Section D: Summary of Findings (attach additional sheets if necessary)			
See attached cover letter.			
<b>Inspector</b>		<b>Reviewer</b>	
<i>3-27-13</i>		<i>3/28/13</i>	
Date		Date	
Aaron M. Pennington Division of Surface Water Southeast District Office		Jennifer M. Witte Compliance & Enforcement Supervisor Division of Surface Water Southeast District Office	

Sections E through K: Complete on all inspections as appropriate  
Y = Yes; N = No; N/A = Not Applicable; N/E = Not Evaluated

### Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee..... Y
- (b) Correct name and location of receiving waters ..... Y
- (c) Do Categorical Standards apply? If yes, list applicable standards..... Y  

40 CFR 434
- (d) Product(s) and production rates conform with permit application (Industries) ..... Y
- (e) Flows and loadings conform with NPDES permit..... Y
- (f) Treatment processes are as described in permit application ..... Y
- (g) All discharges are permitted ..... Y
- (h) Number and location of discharge points are as described in permit..... Y
- (i) Storm water discharges properly permitted..... Y

**Comments/Status:**

Have included pH adjustment for metal precipitation with use of KMnO4 and NaOH in addition to soda ash. Dosage is provided using a weir and dosing wheel.

### Section F: Compliance

- (a) Any significant violations since the last inspection ..... Y
- (b) Appropriate Non-compliance notification of violations..... Y
- (c) Permittee is taking actions to resolve violations ..... Y
- (d) Permittee has a compliance schedule ..... Y
- (e) Compliance schedule contained in ..... Y
- (f) Permittee is in compliance with schedule..... Y
- (g) Has biomonitoring shown toxicity in discharge since last inspection ..... N/A

**Comments/Status:**

### Section G: Operation and Maintenance

#### Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available generator  or dual feed  ..... N/A
  - i. What does the back-up power source operate
  - ii. How often is the generator tested under load
- (b) Which components have an alarm system available for power or equipment failures
- (c) All treatment units in service other than backup units ..... N/A
- (d) What method is used for scheduling routine and preventative maintenance (calendar, software, etc.)
- (e) Any major equipment breakdown since last inspection ..... N
- (f) Operation and maintenance manual provided and maintained ..... N/A
- (g) Any plant bypasses since last inspection ..... N
- (h) Any plant upsets since last inspection ..... N

#### Comments/Status:

### Section H: Sludge Management

- (a) Method of Sludge Disposal.....
  - Land Application
  - Haul to Another NPDES Permittee
  - Haul to a Mixed Solid Waste Landfill

\*if one of the selected methods is land application, complete applicable charts.

**Class A – Exception Quality Sewage Sludge (monitoring station 584)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options							
	Option 1 – 38% Volatile Solids Reduction	Option 2 – Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 - >75% Solids without Unstabilized Solids	Option 8 - >75% Solids with Unstabilized Solids
Alternative 1 – Time and Temperature Regime (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – High pH and High Temperature (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Other Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 4 – Unknown Processes (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Composting (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Drying (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Heat Treatment (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Thermophilic Aerobic Digestion (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Beta Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Gamma Ray Irradiation (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 5 – Pasteurization (84397)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 6 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Class B – Sewage Sludge (monitoring station 581)**

Pathogen Reduction Alternative	84370 Vector Attraction Reduction Options									
	Option 1 – 38% Volatile Solids Reduction	Option 2 – Anaerobic Bench Scale Analysis	Option 3 – Aerobic Bench Scale Analysis	Option 4 – Specific Oxygen Uptake Rate	Option 5 – Aerobic Time and Temperature	Option 6 – Alkali Addition	Option 7 - >75% Solids without Unstabilized Solids	Option 8 - >75% Solids with Unstabilized Solids	Option 9 – Land Injection	Option 10 – Immediate Incorporation
Alternative 1 – Geometric Mean of Seven Fecal Samples (84369)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Aerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Air Drying (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Anaerobic Digestion (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Composting (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 2 – Lime Treatment (46396)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative 3 – Approved Equivalent Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- (b) Has amount of sludge generated changed significantly since the last inspection ..... N/A
- (c) How much sludge storage is provided at the plant
- (d) Records kept in accordance with State and Federal law (5 years according to OAC 3745-40-06) ..... N/A
- (e) Any complaints received in last year regarding sludge ..... N/A
- (f) 5/8" screen at headworks for facilities that land apply sludge ..... N/A
- (g) Are sludge application sites inspected to verify compliance with NPDES permit ..... N/A
- (h) Is a contractor used for sludge disposal ..... N/A  
If so, what is the name of the contractor

Comments/Status:

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### Section I: Self-Monitoring Program

#### Flow Measurement:

- (a) Primary/Secondary flow measuring devices operated and maintained..... Y  
Type of device (e.g., weir with ultrasonic level sensor):
- (b) Calibration frequency adequate ..... N/A  
Date of last calibration:
- (c) 24-hour recording instruments operated and maintained..... N/A
- (d) Flow measurement equipment adequate to handle full range of flows ..... N/A
- (e) Actual flow discharged is measured ..... Y
- (f) Flow measuring equipment inspection frequency  
Daily:  Weekly:  Monthly:  Other:

Comments/Status:

**Sampling:**

- (a) Sampling location(s) are as specified by permit ..... Y
- (b) Parameters and sampling frequency agree with permit ..... Y
- (c) Permittee uses required sampling method (see GLC page) ..... Y
- (d) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e., continuous monitoring instrumentation, calibration and maintenance records) ..... Y

**Comments/Status:**

**Laboratory:**

*General*

- (a) Does the Quality Assurance Manual contain written Standard Operating Procedures (SOP's) for all analysis performed onsite ..... N/A
- (b) Do SOP's include the following if applicable ..... N/A
  - Title
  - Scope and Application
  - Summary
  - Sample Handling & Preservation
  - Interferences
  - Apparatus and Materials
  - Reagents
  - Procedure
  - Calculations
  - Quality Control
  - Maintenance
  - Corrective Action
  - Reference (Parent Method)

*Note: Standard Methods 1020A establishes that "Quality assurance (QA) is the definitive program for laboratory operation that specifies the measure required to produce defensible data of known precision and accuracy. Standard operating procedures are to be used in the laboratory in sufficient detail that a competent analyst unfamiliar with the method can conduct a reliable review and/or obtain acceptable results." SOPs should be developed for each analytical procedure.*

- (c) EPA approved analytical testing procedures used (40 CFR 136.3) ..... Y
- (d) If alternate analytical procedures are used, proper approval has been obtained ..... N/A
- (e) Analyses being performed more frequently than required by permit ..... N
- (f) If (e) is yes, are results in permittee's self-monitoring report ..... N/A
- (g) Satisfactory calibration and maintenance of instruments/equipment (see score from GLC page) ..... Y
- (h) Commercial laboratory used ..... Y

Parameters analyzed by commercial lab: **all but flow and pH**  
 Lab name: **Tradet**

Discharge Monitoring Report Quality Assurance (DMRQA)

- (a) Participation in latest USEPA quality assurance performance sampling ..... N/A  
Date:
- (b) Were any parameters "Unsatisfactory" ..... N/A
- (c) Reasons for "Unsatisfactory" parameters

**Comments/Status:**

For pH, field personel maintain a Hach Meter. They maintain calibrate the meter in accordance with manufacturer recommendation using unexpired buffers and maintain a calibration log.

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**Section J: Effluent/Receiving Water Observations**

Outfall #: **001, 002**  
Outfall Description: **final outfalls**

Receiving Stream: **Riddles Run**  
Receiving Stream Description: " "

**Comments/Status:**

Clear effluent - no signs of metal precipitation occuring in receiving waters. The pH addition prior to settling ponds appear to be effective.

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**Section K: Multimedia Observations**

- (a) Are there indications of sloppy housekeeping or poor maintenance in work & storage areas or laboratories ..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors..... N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation ..... N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks ..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities ..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

**Comments/Status:**