UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: RCRA Inspection [redacted] Mitchell Plant Moundsville WV [redacted]

DATE: 2/19/88

FROM: Douglas A. Donor, Environmental Scientist
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

TO: FILE

THRU: ~~John A. Armstead,~~ Christopher P. Thomas Acting Chief
DELMARVA, DC, WV RCRA Enforcement Section (3HW15)

BASED UPON REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS REQUIRED AT THIS TIME.

In Compliance.

STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
1260 Greenbrier Street
Charleston, West Virginia 25311

ARCH A. MOORE, JR.
Governor

RONALD R. POTESTA
Director

ROBERT K. PARSONS
Deputy Director

January 27, 1988

Mr. P. E. Bischof
Ohio Power Company
P. O. Box K
Moundsville, West Virginia 26041

RCRA COMPLIANCE SECTION
RECEIVED
FEB 16 1988

Dear Mr. Bischof:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on December 30, 1987.

There were no areas of non-compliance of the appropriate Hazardous Waste Management Regulations documented during this inspection.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

Sincerely,

DIVISION OF WASTE MANAGEMENT

Ava C. Zeitz

Ava C. Zeitz
Compliance Monitoring and
Enforcement Section Leader

ACZ/pd
Enclosure
cc: Doug Donor, EPA, Region III
James Fenske, Inspector

INSPECTION FACT SHEET

COMPANY NAME: Ohio Power Company
Mitchell Power Plant

I. D. #: WVD980554943

MAILING ADDRESS: P. O. Box K
Moundsville, West Virginia 26041

TYPE OF FACILITY: Small Quantity Genera

LOCATION: WV State Route 2

COUNTY: Marshall

COMPANY CONTACT:
Mr. P. E. Bischof, Plant Manager
Mr. Timothy Pasingetti, Senior Chemist
Mr. Jim Ludwig, Environmental Engineer

HANDLING CODES: S01

PHONE: (304) 845-6220

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E; and/or 40 CFR Part 265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

D001 F001 F005

DATE INSPECTED: December 30, 1987

INSPECTOR(S): (1) James R. Fenske, West Virginia Department of Natural Resources, Division of Waste Management

(2) David B. Swisher, West Virginia Department of Natural Resources, Division of Waste Management

(3)

DATE PREPARED: January 4, 1988

PREPARED BY: James R. Fenske

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Attachments A - Location Map

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C - Checklist for Small Quantity Generators

INSPECTION REPORT

RE: Mitchell Power Plant, Moundsville, WVD980554943

DATE INSPECTED: December 30, 1987

INSPECTORS: James R. Fenske, West Virginia Department of Natural Resources, Division of Waste Management

David B. Swisher, West Virginia Department of Natural Resources, Division of Waste Management

DATE PREPARED: January 4, 1988

PREPARED BY: James Fenske

On December 30, 1987 at approximately 0945 hours the above referenced inspectors conducted a Compliance Evaluation Inspection of the Mitchell Power Plant. Upon our arrival, we were met by Mr. Timothy Pasingetti, Senior Chemist, Mr. Jim Ludwig, Environmental Engineer, and Mr. P. E. Bischof, Plant Manager who had previously been advised of our intentions to inspect the facility.

Upon presentation of appropriate credentials we advised the company officials of our authority as representatives of the Chief of the Division of Waste Management pursuant of Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act and they acknowledged our authority. The company officials were informed this inspection would emphasize the facility's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regultions promulgated thereunder.

This inspection was conducted in conjunction with an inspection of the Kammer Power Plant adjacent to the Mitchell. Since the last Compliance Evaluation Inspection, the facility has greatly reduced the amount of solvent wastes generated. The facility now utilzies Safety-Kleen of Wheeling to service the majority of solvents used on-site. This practice has reduced the amount of solvents added to the coal feedstock. The facility still utilizes 1,1,1-trichloroethane (F001) as a solvent degreaser but in smaller amounts. Any spent 1,1,1-trichloroethane is mixed with waste oil or kerosene and placed in a drum storage area. Once an adequate amount of drums are accumulated, the waste solvent/oil mixture is added to the facility's coal feedstock along with small amounts of laboratory solvents (F005). It appears the amount of solvents generated by the Mitchell Plant is less than 1000 kg/month.

Other wastestreams generated by the Mitchell Plant are from boiler tube cleanouts. There have been four boiler tube cleanouts since 1982. Cleanouts are based on the amount of deposits built up in the boiler tubes (the boiler tubes consist of a chrome alloy). During the cleanouts, the cleaning agent (2% hydroxyacetic -1% formic acid) often ends up containing some chrome. According to facility representatives, all chrome wastes generated during the cleanout are in trivalent form.

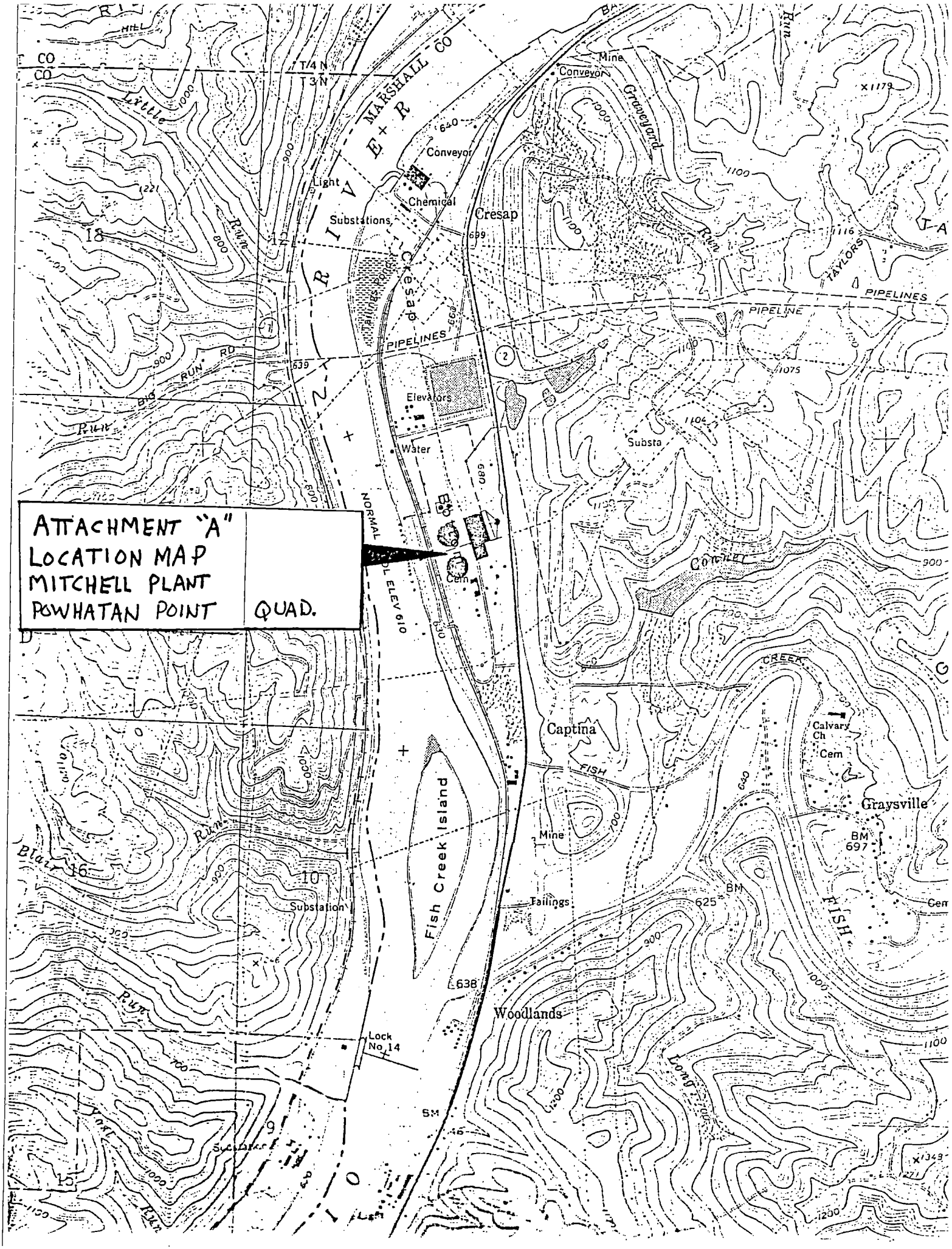
Facility representatives stated a waste determination had been conducted on the boiler tube cleanout wastes for chrome but the waste determination could not be located at the time of the inspection (Mr. Robert Knaul, Senior Chemist for the Mitchell Plant was on vacation leave at the time of the inspection. Mr. Knaul is normally the facility representative for the Mitchell Plant but Mr. Timothy Pasingetti, Senior Chemist for Kammer Plant acted on his behalf. According to facility representatives, Mr. Knaul would normally have the waste determination but due to his absence, the waste determination could not be located). Facility representatives stated they would send the Wheeling Office a copy of the waste determination once it had been located.

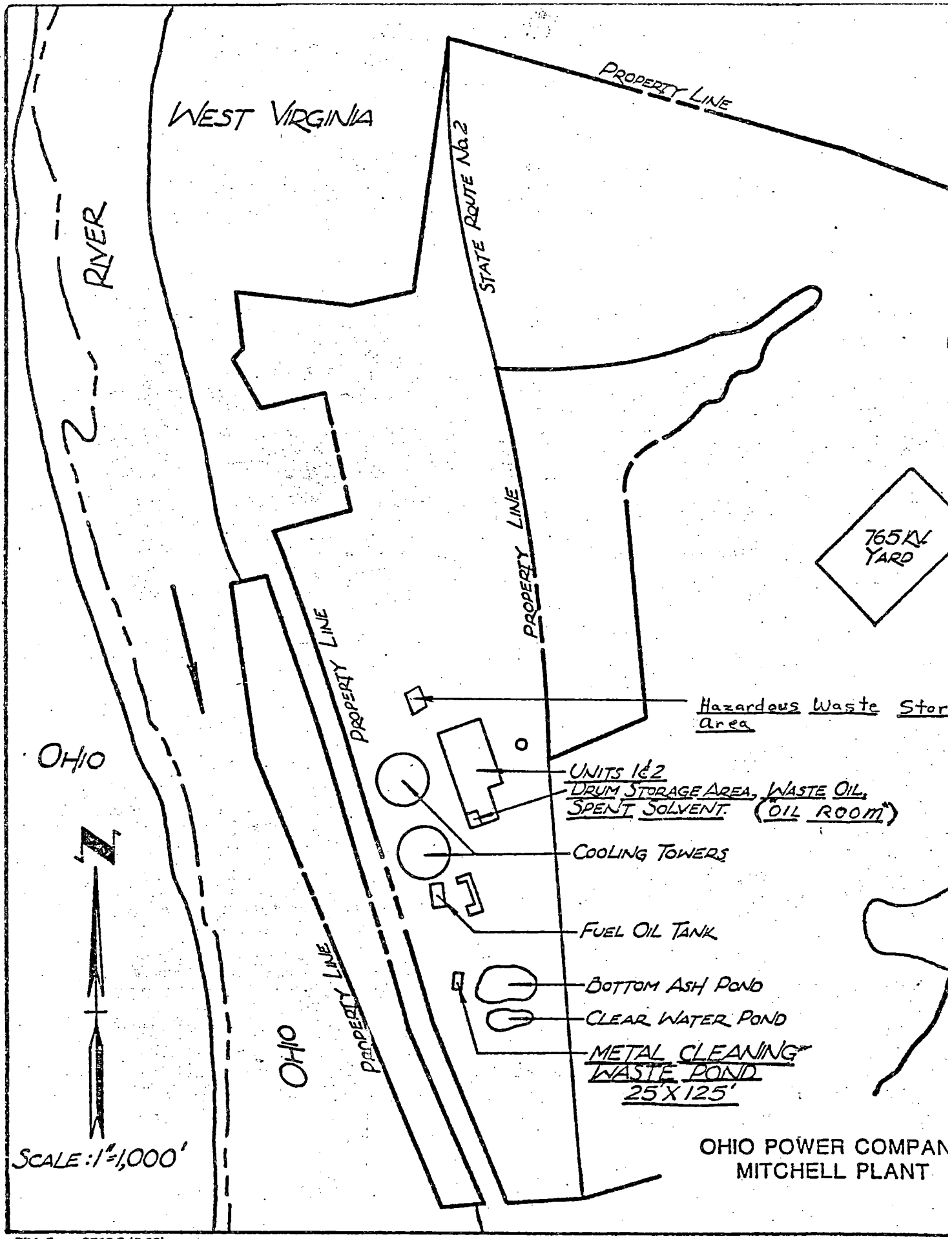
After the cleaning agent is used, it is piped directly to a "metal cleaning waste pond" where the pH is adjusted with lime or caustic soda and iron is precipitated out. Surface water in the clay and pvc lined impoundment is then displaced out an NPDES regulated outfall. Facility representatives also stated they would provide an MSDS for the cleaning agent. Facility representatives felt the pH of the cleaning agent was approximately 3 to 4 but will also provide more specific data along with the MSDS.

After the inspection, we thanked facility representatives for their cooperation and then departed.

COMPLIANCE EVALUATION

No areas of non-compliance of the West Virginia Hazardous Waste Management Regulations were noted during the inspection.


ATTACHMENT "A"
LOCATION MAP
MITCHELL PLANT
POWHATAN POINT QUAD.
MARSHALL CO
RIVER
Cresap
Conveyor
Mine
Graveyard
Light
Chemical
Substations
Little Run
Big Run
PIPELINES
PIPELINE
TAYLORS
Elevators
Water
Substa
NORMAL POOL ELEV 610
Cem
Captina
Calvary Ch
Cem
Graysville
BM 697
FISH CREEK
Fish Creek Island
Mine
Tailings
Substation
Woodlands
Lock No 14
Blair Run
Long Run
Fort Run
T 4 N
T 3 N


WEST VIRGINIA
RIVER
PROPERTY LINE
STATE ROUTE No 2
PROPERTY LINE
PROPERTY LINE
PROPERTY LINE
765 KV YARD
Hazardous Waste Stor area
UNITS 1 & 2
DRUM STORAGE AREA, WASTE OIL, SPENT SOLVENT ("OIL ROOM")
COOLING TOWERS
FUEL OIL TANK
BOTTOM ASH POND
CLEAR WATER POND
METAL CLEANING WASTE POND 25'X125'
OHIO
OHIO
N
SCALE: 1"=1,000'
OHIO POWER COMPAN
MITCHELL PLANT

I. General Facility Information.
Facility Name: MITCHELL POWER PLANT
Facility Location: P.O. BOX K, MOUNDSVILLE, WV 26041 WV
Facility Contact: MR. P.E. BISCHOF, PLANT MANAGER
Epa ID Number: WVD980554943

Comments: _____

Wastes (as Notified or updated) Qty/Mo Disposal Company

D001
F001
F005

II. Checklist for Conditionally Exempt Small Quantity Generators.

NA

A. Are less than 1,000 kg of hazardous waste stored onsite? (Y or N) 10.2.6

B. If the facility is a manufacturing facility, does the CESQG keep on-site a written record specifying the quantity and types of hazardous waste disposed of, the dates the wastes were transported off-site, and the final disposition of these wastes? (Y or N) 10.2.7.c

C. Does the CESQG send his waste to a federally or state permitted disposal facility, a state authorized facility, or a facility which beneficially reuses the waste? (Y or N) 10.2.7.d

D. Comments: _____

III. Checklist for 100 to 1,000 kg per month SQG's.

A. Storage requirements:

1. Requirements for wastes stored in containers.

10.1.3 a. Is storage less than 180 days (Y or N) or, if the generator must ship his waste more than 200 miles to a TSD, is storage less than 270 days? (Y or N)

10.1.3.a b. Is storage less than 6,000 kg on-site? (Y or N)

10.1.3.c c. Are containers labeled "HAZARDOUS WASTE," with the date marked when collection began? (Y or N)

10.1.3.b d. Are containers in good condition? (Y or N)

10.1.3.b e. Are containers kept closed? (Y or N)

10.1.3.b f. Are containers inspected weekly? (no log required) (Y or N)

10.1.3.b g. Are reactive and ignitable wastes stored in a "buffer zone"? (Does not have to be 50 feet from property line) (Y or N)

10.1.3.b h. Are incompatible wastes stored separately? (Y or N) NA

2. Requirements for wastes stored in tanks:

10.1.3.b NA a. Are tanks covered (Y or N) or, if open, do they have at least two feet of freeboard? (Y or N)

10.1.3.b b. On continuous-feed tanks, is there a shutoff or by-pass valve? (Y or N)

10.1.3.b c. Are monitoring and gauging systems checked daily? (Y or N)

10.1.3.b d. Are tanks checked weekly for corrosion and leaks? (Y or N)

10.1.3.b e. Are NFPA buffer zone requirements for ignitable and reactive wastes being met? (Y or N)

10.1.3.a f. Is storage less than 6,000 kg on-site? (Y or N)

10.1.3 (10.1.4) g. Is storage less than 180 (270) days)? (Y or N)

3. Comments: _____

B. Contingency and Emergency Planning.

1. Has the facility appointed an emergency coordinator? (Y or N). (Name of Coordinator P.E. BISCHOFF) 10.1.3.d.1

2. Has the facility posted the following information next to the phone:

   a. the name and telephone number of the emergency coordinator where he can be reached 24 hours a day? (Y or N) 10.1.3.d.2.A

   b. the location of fire extinquishers and spill control material and, if present, the fire alarm? (Y or N) 10.1.3.d.2.B

   c. the telephone number of the fire department, unless the facility has a direct alarm? (Y or N) 10.1.3.d.2.C

3. Can the generator ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies? (Y or N) 10.1.3.d.3

4. Comments: _____

IV. Recordkeeping Requirements.

A. Has the generator a copy of each manifest completed in the past three years? (Y or N) 10.1.2

B. Are his manifests completed properly? (Y or N) 10.1

C. If the generator's wastes are shipped off-site under a contractual agreement as outlined at 10.1.1 of the WV Hazardous Waste Regulations, does the generator have a copy of this agreement on file? (for at least three years after termination of the agreement) (Y or N) 10.1.1.b

D. Has the generator a copy of any test results or waste analyses performed in accordance with 6.1.1 of the WV Hazardous Waste Regulations (Hazardous Waste Determination) during the past three years? (Y or N) 10.1.2

E. Comments: _____