OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

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

March 23, 2007

Re: Adams County
DP&L Stuart Station
Compliance Inspection
Ohio EPA Permit No. 0IB00049*MD
NPDES Permit No. OH0004316
Correspondence (IWW/Major)

Mr. David Orme, Plant Manager
Dayton Power and Light
Stuart Station Generating Station
P.O. Box 468
Aberdeen, Ohio 45101

Dear Mr. Orme:

On March 5, 2007, Ben Reed (Ohio EPA-Division of Drinking and Ground Water), Mike McCullough (Ohio EPA-Division of Surface Water) and I conducted a compliance evaluation inspection (CEI) at the Dayton Power and Light (DP&L) Stuart Station. This inspection serves as both the annual inspection and the pre-permit renewal inspection for the above referenced facility. Mr. Troy Williams accompanied us during the inspection. The purpose of the inspection was to determine compliance with the terms and conditions of the NPDES permit issued to the DP&L Stuart Station.

Based on the findings of the inspection and the review of our records, I have the following comments:

- During the inspection, it appeared that significant strides had been taken to minimize the amount of coal accumulation under the barge off-loading facility, however, small amounts of spilled coal did still exist below the conveyor system. Also, it appeared that a significant amount of coal had been dumped or placed along an access road just to the west of the barge off-loading facility. There was no activity at the time of the inspection to move or recover this coal to the coal storage yard. Coal off loaded from barges and used at your facility should only be stored on the coal storage yard. Please move or recover the above mentioned pile of coal to the coal storage yard as soon as possible.

- Six permit limit violations of total recoverable copper concentrations were reported in the past year for the wastewater stream that discharges from outfall 013. The permit limit violations are outlined in the following table. Please provide an explanation for the listed limit violations along with a plan of action to prevent any further copper limit violations from outfall 013 in your response.

Reporting Period	Parameter	Limit	Reported Value	Violation Date
2006				
February 2006	Copper, Total Recoverable	53	54.	2/8/06
April 2006	Copper, Total Recoverable	53	63.	4/5/06
May 2006	Copper, Total Recoverable	53	60.	5/31/06
2007				
February 2007	Copper, Total Recoverable	53	56.	2/7/07
February 2007	Copper, Total Recoverable	53	54.	2/14/07
February 2007	Copper, Total Recoverable	53	59.	2/28/07

- During the inspection of the package sewage treatment plant (outfall 609), the blowers which feed air to the aeration basins did not seem to be operating correctly. Judging by the state of the mixed liquor in the aeration basins and the low dissolved oxygen concentrations reported on the MORs, the blowers had been insufficiently operated for a significant period of time. Please include a plan to repair or reset the timers on the blowers to achieve proper biological treatment of the domestic waste water prior to discharge in your response.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's *"Facility Pollution Prevention Guide"* (EPA/600/R-92.008), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

The assistance and cooperation received during the inspection are appreciated. A copy of my completed inspection report is enclosed. Please submit a written response to the aforementioned comments within 30 days of receipt of this letter. If you have any questions, please contact me at (740) 380-5226.

Sincerely,

Patrick Hudnall
District Representative
Division of Surface Water

PH/dh

Enclosure

c: Troy Williams, Dayton Power & Light, Stuart Station
c: Aaron Wolfe, SEDO, DSW
c: Mike McCullough, CO, DSW

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00049*MD	OH0004316	March 5, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Dayton Power & Light Stuart Generating Station P.O. Box 468 Aberdeen, Ohio 45101	10:00	September 1, 2005
	Exit Time	**Permit Expiration Date**
	11:30	June 30, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Troy Williams, Wastewater Representative	(937) 549-2641 Ext. 5064
Name, Address and Title of Responsible Official	**Phone Number**
David Orme, Plant Manager Dayton Power & Light Stuart Station	(937) 549-2641

C. AREAS EVALUATED DURING INSPECTION

S	Permit	S	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	S	Compliance Schedules
M	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
M	Facility Site Review	N	Sludge Storage/Disposal		Other
N	Collection System				

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

See attached inspection letter.

Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office — Date 3/23/07

Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office — Date 3/23/07

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

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: New FGD process in construction but not online at time of inspection.

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 Current Permit				
e. Permittee is meeting compliance schedule	X			

Comments: see comment about copper violations in inspection letter

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator ____ Dual Feed X	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: # of shifts 3 Days/Week 7	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 X on MORS X 800 Number	X			
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments:

H. SLUDGE MANAGEMENT

a. Sludge Management Plan
_____ Submitted Date
_____ Approval Number
__X__ Not submitted
_____ N/A

	Yes	No	N/A	N/E
b. Sludge Management Plan current			X	
c. Sludge adequately disposed (Method: Hauled to Maysville WWTP)	X			
d. If sludge is incinerated, where is ash disposed of? _____				
e. Is sludge disposal contracted (Name: AA Sanitation)	X			
f. Has amount of sludge generated changed significantly since last inspection		X		
g. Adequate sludge storage provided at plant	X			
h. Land application sites monitored and inspected per SMP			X	
I. Records kept in accordance with state and federal law	X			
j. Any complaints received in last year regarding sludge		X		
k. Is sludge adequately processed (digestion, dewatering, pathogen control)	X			

Comments:

I. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement	Yes	No	N/A	N/E
a. Primary flow measuring device properly operated & maintained. Type of device: _____ ultrasonic & parshall flume __X__ weir _____ ultrasonic & weir _____ calculated from influent __X__ Other Specify: paddle wheel device @ 012	X			
b. Calibration frequency adequate (date of last calibration _____)			X	
c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained			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: __X__ Daily _____ Weekly _____ Monthly _____ 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				
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				
e. Commercial laboratory used 1. Parameters analyzed by commercial lab: _____ 2. Lab name: Test America	X			

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None		river water
002	None	None	None	None	None		river water
008	None	None	None	None	None	None	
010	None	None	None	None	None	None	
012	None	None	None	None	None	None	
013	None	None	None	None	None	None	
019	None	None	None	None	None	None	
020	None	None	None	None	None	None	
609	None	None	None	None	None	None	

Comments:

K. MULTIMEDIA OBSERVATIONS

	Yes	No	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories	X			
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment		X		

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

1. What is the cause of the conditions?
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: