



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Kotleski, Director

September 22, 2010

DPH Holding Company, Home Avenue
Attn: Deborah Avery
250 Northwoods Blvd.
Vandalia, OH 45377

RE: DPH Holding Company, Home Avenue CRO Inspection (OHD000817023)

Dear Ms. Avery:

In a letter dated January 20, 2010, DPH Holdings Corporation, formerly Delphi Corporation Home Ave. Operations requested an extension of the 90-day Cessation of Regulated Operations (CRO) requirements found in Ohio Revised Code (ORC) §3752.06(A)(4) to (6) for its facility located at 2701 Home Ave Dayton, Ohio. DPH Holding Company requested an extension until July 16, 2010.

On August 12, 2010 representatives from Ohio Environmental Protection Agency inspected the facility at 2701 Home Ave in Dayton, Ohio. The purpose of the inspection was to evaluate compliance with Ohio's CRO laws found in Chapter 3752 of the ORC and Chapter 3745-352 of the Ohio Administrative Code (OAC). Our inspection included a walkthrough of the facility's multiple buildings. Based on the inspection, Ohio EPA has determined DPH Holding Company is in violation of the following Ohio hazardous waste rule:

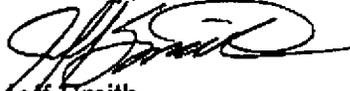
1. **OAC 3745-352-20 (A)(2)(d): What are my responsibilities if I am an owner or operator?** Drain or remove all regulated substances from each stationary tank, vat, electrical transformer, and vessels, and from all piping, that is to remain at the facility and remove from the facility all regulated substances and all debris, non stationary equipment and furnishing nonstationary containers and motor vehicles and rolling stock that contain or are contaminated with "regulated substances, as defined in rule 3745-352-05 of the Administrative Code.

DPH Holding Company failed to comply with this rule in that Ohio EPA noted a number of locations throughout the facility with regulated substances. Delphi also failed to remove regulated substances from Buildings 25A, Building 12 and

the weather stripping operation along Building 25's south side. At the time of the inspection DPH Holding Company informed Ohio EPA that these buildings were not done because of concerns with worker safety and the buildings would need to be torn down to remove the regulated materials. **DPH Holding Company will be returned to compliance once all regulated materials have been removed from this site. Please submit an updated schedule from the January 20, 2010 extension request to Ohio EPA within 14 days upon receipt of this letter for review and approval.**

Should you have any questions feel free to contact me at (937) 285-6070.

Sincerely,



Jeff Smith
District Representative
Division of Hazardous Waste Management

cc: George Strobel, Ohio EPA, SWDO, DHWM

JS/ca