



State of Ohio Environmental Protection Agency

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MONTGOME DAYTON POWER & LIGHT CO OH HUTCHINGS OSIKA, MARY 2008/05/30
STATION

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

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State of Ohio Environmental Protection Agency

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

May 30, 2008

Mark Guerriero
Dayton Power and Light Company
O.H. Hutchings Station
9200 Chautauqua Road
Miamisburg, Ohio 45342

RE: Compliance Evaluation Inspection (CEI)
NPDES Permit 11B00004*ID, OH0009261

Dear Mr. Guerriero:

On May 22, 2008, I conducted a NPDES Compliance Evaluation Inspection with Keisha Varner representing the Dayton Power & Light – O.H. Hutchings Station. A copy of my inspection report is attached. All areas evaluated were rated as satisfactory with the exception of Operation and Maintenance of the sewage treatment plant. That area was rated marginal due to the amount of solids seen in the disinfection tanks at the time of the inspection. A response to this issue is requested as detailed in the Summary of Findings/Comments attachment to the report.

I have been assigned as the facility contact for this facility and request you submit any NPDES correspondence to my attention at this office. If you have any questions regarding the inspection or the CEI report, please contact me at (937) 285-6101 or by email at mary.osika@epa.state.oh.us.

Sincerely,

Mary Osika
Environmental Specialist
Division of Surface Water

Enclosures

cc: Keisha Varner, D. P. & L. – O.H. Hutchings Station

Summary of Findings/Comments

John Spittler who was the previous inspector at this facility has retired from Ohio EPA and Mary Osika is now the new inspector and contact person for this facility.

The NPDES permit is set to expire on July 31, 2008. A renewal NPDES application was received by Ohio EPA on January 31, 2008. The agency plans on postponing renewal of the permit until 2009 when river modeling studies are completed.

The facility is generally in compliance with the NPDES permit. During the review period of March 2007 – April 2008, only two (2) effluent limit violations were noted during the month of July 2007 for Oil and Grease.

Keisha Varner at the facility holds a Class A wastewater operator certificate. Record keeping was discussed with her as it pertains to the wastewater operator regulations at Ohio Administrative Code 3745-7. Keisha also provided a copy of the DMR QA study 27 and went over the results and corrective action for the one unacceptable result noted.

During the inspection of the outfalls and sewage treatment plant, I observed ash being removed from the ash ponds. I was told the ash was being disposed at an adjacent farm for beneficial use. I later asked Keisha for a copy of the authorization letter for that activity. I received that information from Keisha which included a November 21, 2006 copy of the authorization letter to Timothy A. Humerick, owner of the farm/racing stable who is using the fly ash for structural fill.

During the inspection of the sewage treatment plant, I observed an unacceptable amount of solids in the chlorination and dechlorination tanks. I recommend that a regular solids wasting schedule to the sludge holding tank be instituted in order to prevent solids from accumulating in the disinfection tanks. This seems to be an operation and maintenance issue only since there are no violations of the total suspended solids limit during the review period. I was told that the sludge disposal contractor had been called to remove these solids.

Response Required

The only response required to this inspection is regarding the date the sludge disposal company performed the removal of solids seen in the disinfection tanks. Please report the date of this maintenance work to Mary Osika, Division of Surface Water.



State of Ohio Environmental Protection Agency
Southwest District Office

NPDES Compliance Inspection Report

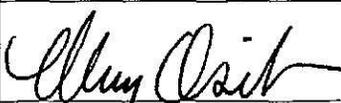
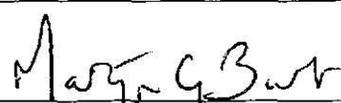
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11B00004*ID	OH0009261	5/22/2008	C	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Dayton Power and Light Company O.H. Hutchings Electric Generating Station 9200 Chautauqua Road Miamisburg, Ohio	1:00 pm	August 2, 2003
	Exit Time	Permit Expiration Date
	3:00 pm	July 31, 2008
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Keisha Varner, Laboratory Supervisor	(937) 865-6298	
Name, Address and Title of Responsible Official	Phone Number	
Mark Guerriero, Plant Manager D.P. & L. - O.H. Hutchings Station 9200 Chautauqua Road Miamisburg, Ohio 45342	(937) 865-6233	

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

Section D: Summary of Findings (Attach additional sheets if necessary)

See attached sheet of Summary of Findings.

Inspector	Reviewer
 Mary Osika Environmental Specialist Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
5/30/08 Date	5/30/08 Date

Sections E thru 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) Product(s) and production rates conform with permit application (Industries)..... Y
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N/A
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

NPDES permit is set to expire on July 31, 2008. A renewal application was received on January 31, 2008. The agency plans on postponing renewal until 2009 when river modeling studies are completed.

Section F: Permit Compliance

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... N/A

Comments/Status:

Two (2) effluent limit violations are noted during the review period (March 2007-April 2008) for Oil and Grease at outfall 002 during the month of July 2007.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed N
- (b) Adequate alarm system available for power or equipment failures.. Y
- (c) All treatment units in service other than backup units..... Y
- (d) Wastewater Treatment Works classification (OAC 3745-7)..... A
- (e) Operator of Record holds unexpired license of class required by permit..... Y
 Class: A
- (f) Copy of certificate of Operator of Record displayed on-site..... Y
- (g) Minimum operator staffing requirements fulfilled (OAC 3745-7)... Y
- (h) Routine and preventative maintenance scheduled/performed... Y
- (i) Any major equipment breakdown since last inspection..... Y
- (j) Operation and maintenance manual provided and maintained..... Y
- (k) Any plant bypasses since last inspection..... N
- (l) Regulatory agency notified of bypasses..... N/A
 On MORs and/or Spill Hotline (1-800-282-9378)
- (m) Any hydraulic and/or organic overloads since last inspection..... Y

Record Keeping:

- (a) Log book provided..... Y
- (b) Format of log book (i.e. computer log, hard bound book)

Log book is hard bound & computer time sheets.
- (c) Log book(s) kept onsite (in an area protected from weather)..... Y
- (d) Log book contains the following:
 - I. Identification of treatment works..... Y
 - II. Date/times of arrival/departure for Operator of Record and any other operator required by OAC 3745-7..... Y
 - III. Daily record of operation and maintenance activities (including preventative maintenance, repairs and request for repairs)..... Y
 - IV. Laboratory results (unless documented on bench sheets)... N
 - V. Identification of person making log entries..... Y
- (d) Has the operator of record submitted written notification to the permittee, Ohio EPA and (if applicable) any local environmental agencies when a collection system overflow, treatment plant bypass or effluent limit violation has occurred..... Y

Section G: Operation & Maintenance (con't)

Collection System:

- (a) Percent combined system: 0%
- (b) Any collection system overflows since last inspection..... N/A
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... N/A
- (d) CSO O&M plan provided and implemented..... N/A
- (e) CSOs monitored and reported in accordance with permit..... N/A
- (f) Portable pumps used to relieve system..... N/A
- (g) Lift station alarms provided and maintained..... N/A
- (h) Are lift stations equipped with permanent standby power
or equivalent..... N/A
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... N/A
- (j) Any complaints received since last inspection of basement flooding N/A
- (k) Are any portions of the sewer system at or near capacity..... N/A

Comments/Status:

Keisha Varner, Lab Supervisor, located on site at the facility, holds a class A Wastewater Operator Certificate.

Sewage treatment plant contained excessive solids in the chlorination and dechlorination tanks. Waste hauling has been contacted to remove these solids. Recommend a regular wasting schedule to the sludge holding tank to reduce solids from collecting in the chlorination/dechlor tanks.

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A
- (b) Sludge management plan current..... N/A
(c) Sludge adequately disposed..... N/E
(Method: hauled to public treatment facility)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... Y
(Name: AAA Septic)
(f) Has amount of sludge generated changed significantly since
last inspection..... N/E
(g) Adequate sludge storage provided at plant..... Y
(h) Land application sites monitored and inspected per SMP..... N/A
(i) Records kept in accordance with State and Federal law..... Y
(j) Any complaints received in last year regarding sludge..... N
(k) Is sludge adequately processed (digestion, pathogen control)..... N/A

Comments/Status:

See comments on page 4 regarding operation and maintenance, sludge wasting recommendations.

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... Y
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate N/A
(Date of last calibration:)
- (c) Secondary instruments operated and maintained..... Y
(d) Flow measurement equipment adequate to handle full range
of flows..... Y
(e) Actual flow discharged is measured..... N
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

Flow calculated from influent pumps.

Section I: Self-Monitoring Program (con't)

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..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... Y
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) 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
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
- (b) If alternate analytical procedures are used, proper approval has been obtained..... Y
- (c) Analyses being performed more frequently than required by permit. N
- (d) If (c) is yes, are results in permittee's self-monitoring report..... Y
- (e) Commercial laboratory used..... Y

Lab name & Parameters analyzed by commercial lab:
Test America – Oil & Grease
DP& L – pH, TSS, TRC
Belmont Labs – all others

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. Y
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: 10/22/2007

Comments/Status:

DMR QA had one unacceptable result for pH. Issue was resolved.

Section J: Effluent/Receiving Water Observations

Outfall Number	Outfall sign in place?	Oil sheen	Grease	Turbidity	Foam	Solids	Color	Other
001	No							NCCW submerged
002	No							Ash pond
003	No							Storm
004	No							Sanitary

Comments/Status:

Could not view outfalls due to fence and vegetation/steep bank. Viewed outfall areas from opposite side and did not view any noticeable pollutant characteristics.

Outfall signs are not a requirement in the current permit, but will be in the next renewal.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and 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:

