State of Ohio Environmental Protection Agency

Southeast District Office

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Logan, Ohio 43138

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

August 17, 2007

Re: Adams County
DP&L Killen Station
Compliance Inspection
Ohio EPA Permit No. 0IB00022*ED
NPDES Permit No. OH0060046
Correspondence (IWW/Major)

Mr. Cliff Waits, Plant Manager
Dayton Power and Light
Killen Generating Station
14869 U.S. 52
Manchester, Ohio 45144

Dear Mr. Waits:

On August 7, 2007, I conducted a compliance evaluation inspection (CEI) at the Dayton Power and Light (DP&L) Killen Electric Generating Station. Mr. Jim Stice accompanied me during the inspection. The purpose of the inspection was to determine DP&L Killen Station's compliance with the terms and conditions of its NPDES permit.

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

- A significant amount of fly ash had been spilled along the east side of the Fly Ash Building. The spilled fly ash reportedly came from overloaded and/or poorly maintained fly ash processing equipment inside the Fly Ash Building. Immediately recover the spilled fly ash and take the necessary measures to properly maintain the fly ash processing equipment so as to eliminate fly ash spills.

- At the time of the inspection, there was a leak in the force main leading from the main lift station to the ash pond. According to Mr. Stice, the waste water which was leaking from the force main was running around a ditch at the base of the outer slope of the ash pond and rejoining outfall 001 prior to the sampling point. Sampling events conducted after the discovery of the leak indicated that NPDES discharge limitations had not been exceeded as a result of the leak. However, the leak constitutes a bypass of a treatment unit and is a violation of your NPDES Permit. Immediately, take the necessary actions to repair and maintain in good working order the lift station and force main.

- The management of coal at the barge off-loading facility appeared to have improved. Continue your efforts to minimize the spillage of coal from the barge off-loading facility.

- Stormwater issues were not evaluated as part of this inspection. A representative of our office will be contacting you to conduct a stormwater inspection in the future.

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: Jim Stice, Environmental Engineer, Dayton Power & Light, Killen Station

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IB00022*ED	OH0060046	August 7, 2007	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
DP&L Killen Generating Station 14869 US Highway 52 Manchester, Ohio	9:15 a.m.	July 1, 2006
	Exit Time	**Permit Expiration Date**
	11:00 a.m.	January 31, 2008

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Jim Stice, Environmental Engineer	(937) 549-3911, Ext. 2140
Name, Address and Title of Responsible Official	**Phone Number**
Cliff Waits, Plant Manager	(937) 549-3911

C. AREAS EVALUATED DURING INSPECTION

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

Patrick Hudnall, Inspector, Ohio EPA, Southeast District Office

8/16/07
Date

Timothy M. Campbell

Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

8/17/07
Date

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 scrubbers have been installed and are operational.

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 _____			X	
e. Permittee is meeting compliance schedule			X	

Comments:

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator __X__ Dual Feed _____	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 __4__ 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 _____ on MORS __X__ 800 Number	X			
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: * See inspection letter item 2 - lift station leak

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 by Safety Kleen)	X			
d. If sludge is incinerated, where is ash disposed of? _____			X	
e. Is sludge disposal contracted (Name: Safety Kleen)	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: __X__ ultrasonic & parshall flume _____ calculated from influent _____ weir _____ Other _____ ultrasonic & weir Specify: _____	X			
b. Calibration frequency adequate (date of last calibration 7/07)	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 __X__ Monthly _____ Other				

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			

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	X			
e. Commercial laboratory used 1. Parameters analyzed by commercial lab: All except TSS, pH, and Chlorine 2. Lab name: Test America	X			

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	None	
003	None	None	None	None	None	None	
004	None	None	None	None	None	None	
601	None	None	None	None	None	None	
602	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		

Comments: