



REGIONAL AIR POLLUTION CONTROL AGENCY

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February 28, 2007

Certified Mail

Mr. Mark Guerriero, Plant Manager
Dayton Power & Light Company
O.H. Hutchings Station
9200 Chautauqua Road
Miamisburg, OH 45342

NOTICE OF VIOLATION

Summary: On November 2, 2006, Ohio EPA emissions unit B001 failed a performance test for particulate matter at Dayton Power & Light's (DP&L's), O.H. Hutchings Station on Chautauqua Road in Miamisburg, Ohio. A violation of the visible particulate emissions limitation was also documented. A retest was conducted on B001 on December 13, 2006, which indicated the emissions unit was in compliance with the allowable particulate emissions limitation. Additionally, November 2006 performance testing on emissions units B002 and B003 failed to provide a satisfactory demonstration of compliance due to low operating capacities achieved during testing of B002 and B003 and marginal particulate emission rate results for B003. The Regional Air Pollution Control Agency (RAPCA) is requiring a retest on emissions units B002 and B003 for particulate emissions.

Dear Mr. Guerriero:

In November 2006, performance testing was conducted on six coal-fired boilers at DP&L's O.H. Hutchings Station, identified as Ohio EPA emissions units B001, B002, B003, B004, B005 and B006, Ohio EPA Facility ID 0857780013. The purpose of this testing was to determine compliance with the allowable mass emission rates for particulate and sulfur dioxide as stipulated in the Title V permit, effective January 13, 2003.

The allowable particulate emission rate for each of the coal-fired boilers, B001 through B006, was determined pursuant to the requirements set forth in Ohio Administrative Code (OAC) rule and Montgomery County Combined General Health District Air Pollution Control Regulations (MCCGHDAPCR) rule 3745-17-10 (C), Restrictions on particulate emissions from fuel burning equipment. The allowable particulate emission rate for each emissions unit is 0.10 pound of particulate emissions per million Btu (lb/mmBtu) actual heat input.

The allowable visible particulate emissions limitation for each of the coal-fired boilers was determined pursuant to the requirements set forth in OAC and MCCGHDAPCR rule 3745-17-07 (A),

Mr. Mark Guerriero
February 28, 2007
Page 2

Control of visible particulate emissions from stationary sources. The allowable visible particulate emissions limitation for each emissions unit is 20% opacity as a 6-minute average, except as provided in OAC 3745-17-07 (A)(3).

The average particulate emission rate for B001 during the performance test on November 2, 2006, was determined to be 0.11 lb/mmBtu. B001 operated at 71% of its rated capacity during the test. During run #3 of the performance test, two opacity exceedances, with six-minute averages of 21.0% and 26.2%, were documented by the facility's continuous opacity monitoring system. DP&L is hereby notified that B001 violated OAC rule and MCCGHDAPCR rules 3745-17-10 (C), 3745-17-07 (A), the Title V permit, and Ohio Revised Code (ORC) section 3704.05.

Performance testing was conducted on November 6, 2006, for B002 and on November 21, 2006, for B003. The average particulate emission rate for B002 was determined to be 0.03 lb/mmBtu, but the boiler only achieved 65% of its rated capacity during the test. The average particulate emission rate for B003 was determined to be 0.08 lb/mmBtu with the boiler operating at 76% of its rated capacity. RAPCA has determined that the results for B002 are inconclusive due to its very low rate of operation during the performance test. RAPCA does not believe the performance test for B003 to be a valid demonstration of compliance with the unit emitting 80% of its allowable particulate emissions while operating at only 76% of its rated capacity. RAPCA requires that DP&L submit an ITT within 30 days of receipt of this letter for a retest to be conducted on B002 and B003 within 60 days.

Enclosed is a stack test summary (Table 1) of the particulate emissions and corresponding operating rates for B001 through B006 from 2002 through 2006. Since 2002, RAPCA has noted a significant decrease in operating capacities achieved by each of the boilers during stack testing. An overall reduction in operating capacities of 15% to 30% has occurred since 2002. Most noteworthy is the extreme decrease in achievable operating rates that has occurred in the past two years on all six of the emissions units. RAPCA requests that DP&L submit an explanation for the systemic loss in capacity that has occurred since 2002, as well as the corrective actions the facility is undertaking to reverse the trend.

Due to the low operating capacities experienced during the November 2006 performance tests by the remainder of DP&L's coal-fired boilers (B004, B005 & B006), no final compliance determinations have been made by RAPCA with respect to the test results. The agency will make that determination following the outcome of the retests on B002 and B003.

With regards to operating rates during future performance testing, RAPCA again refers DP&L to the federal stack test protocol which states the emissions units must be operated at maximum capacity. RAPCA discussed this issue in detail with DP&L in 1998, and also during the recent testing conducted in 2006. Additionally, Part III.A.V.1 of DP&L's Title V permit for B001 through B006 requires that particulate emissions testing be conducted while the emissions unit is operating at or near its maximum capacity.

Mr. Mark Guerriero
February 28, 2007
Page 3

DP&L attributed the primary reason for the failed test on B001 to be due to reversed thermocouples on one of the mills serving the boiler. On December 13, 2006, DP&L conducted a retest on B001. The average particulate emission rate was determined to be 0.01 lb/mmBtu with B001 operating at 80% of its rated capacity. Due to only two days notice prior to testing, RAPCA was unable to officially witness the retest. There was, however, a RAPCA representative on site during a portion of the test, and RAPCA has determined that the reported results indicate compliance. RAPCA has noted, however, that the results of the particulate emission rate from the retest are significantly (11 times) lower than the results of the November 2, 2006, performance test, and lower than *any* of the particulate emission rates listed in Table 1 for the past five years of testing on B001 through B006. RAPCA asks that DP&L provide the date when the facility believes the thermocouples were reversed and the date when the problem was corrected. In addition, RAPCA requests that DP&L provide a list of any other maintenance or repairs that were made to B001, as well as an explanation for the dramatic decrease in the measured particulate emission rates between the November 2006 and December 2006 performance testing.

Please submit all above-requested information within 30 days of receipt of this letter. Acceptance of this information does not constitute a waiver of the Ohio EPA's and RAPCA's authority to seek civil penalties as provided in section 3704.06 and 3707.49 of the Ohio Revised Code. The determination whether to pursue such penalties will be made by the Ohio EPA and RAPCA at a later date.

We appreciate your cooperation and hope to resolve this matter as soon as possible. If you have any questions, please contact Christine Swetz at (937) 496-7541.

Sincerely,



Jennifer Marsee
Supervisor
Abatement Unit

Enclosure

cc: Lisa Holscher, USEPA
Tom Kalman, Ohio EPA
John Paul, RAPCA

TABLE 1
DP&L Hutchings
0857780013
2002-2006 Stack Test Summary

Particulate Emission Rate (lb/mmBtu actual heat input); Operating rate during test (% of max capacity); Avg. coal value -Btu/lb															
Emission Unit	March & July 2002 (tested in March or July)			Dec. 2003			Nov. 2004			Oct. & Dec. 2005 (tested in Oct. or Dec.)			Nov. 2006		
	B001	0.055	90%	12,621	0.045	86%	12,184	0.025	91%	12,246	0.033*	85%	12,688	0.111	71%
B002	0.045	96%	12,566	0.035	84%	12,189	0.049	83%	12,358	0.055	79%	12,249	0.029	65%	12,140
B003	0.051	96%	12,534	0.051	90%	12,477	0.065	89%	12,311	0.029*	84%	13,187	0.083	76%	12,094
B004	0.047	95%	12,119	0.029	94%	12,350	0.047	87%	12,275	0.026	81%	12,444	0.035	80%	12,062
B005	0.040	95%	12,166	0.040	93%	12,689	0.028	94%	12,396	0.026*	88%	13,166	0.053	76%	12,142
B006	0.029	93%	12,417	0.038	90%	12,112	0.042	91%	12,370	0.021	81%	12,162	0.035	79%	12,133
													Dec. 2006 Retest B001		
B001													0.012	80%	12,464

Particulate Allowable = 0.10 lb/MMBtu actual heat input

* - RAPCA determined different values than that of stack test report due to a calculation error identified in test report. The above values reflect RAPCA's revised calculations.

Boiler Capacities

- B001 - 736 mmBtu/hr
- B002 - 701 mmBtu/hr
- B003 - 720 mmBtu/hr
- B004 - 696 mmBtu/hr
- B005 - 703 mmBtu/hr
- B006 - 727 mmBtu/hr

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1. Article Addressed to:

MR MARK GUERRIERO
DAYTON POWER & LIGHT
O.H. HUTCHINGS STATION
9200 CHAUTAUQUA ROAD
MIAMISBURG, OH 45342

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