



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

July 14, 2008

**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
J. M. Stuart Generating Station
P.O. Box 468
Aberdeen, Ohio 45101

Dear Mr. Orme:

On June 18, 2008, Aaron Pennington (Ohio EPA-Division of Surface Water) and I conducted a compliance evaluation inspection (CEI) at the Dayton Power and Light (DP&L) Stuart Station. 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, evidence of significant coal spillage from the coal barge off-loading facility was apparent. Contaminated stormwater discharging to the Ohio River from the areas of spilled coal under the coal barge off-loading facility constitutes an uncontrolled release of pollutants and is in violation of your NPDES Permit. Runoff from the coal barge off-loading facility must comply with Part V, Section A (Coal Pile Runoff effluent limitations) of your NPDES Permit. Within three (3) months of the date of this letter, DP&L shall submit, for review by Ohio EPA, a plan to address the uncontrolled release of pollutants from the coal barge off-loading area. This plan shall include a time line for completion of all proposed pollution abatement measures. Eliminating the exposure of spilled coal to stormwater appears to be the only feasible and assured method to eliminate the uncontrolled discharge.
- Six permit limit violations of total recoverable hexavalent chromium concentrations were reported for the months of December 2008, January 2008, June 2008 and July 2008 for the wastewater stream that discharges from outfall 013. The permit limit violations are outlined in the following table.

Report Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
Dec 2007	013	Chromium, Dissolved He	1D Conc	31	33.4	12/18/07
Dec 2007	013	Chromium, Dissolved He	1D Conc	31	40.7	12/26/07
Jan 2008	013	Chromium, Dissolved He	1D Conc	31	36.8	1/3/08
Jan 2008	013	Chromium, Dissolved He	1D Conc	31	37.4	1/15/08
June 2008	013	Chromium, Dissolved He	1D Conc	31	87.5	6/24/08
July 2008	013	Chromium, Dissolved He	1D Conc	31	79	7/1/08

As a result of the above listed violations, DP&L Stuart Station appeared in the January-March 2008 Quarterly Non-Compliance Report (QNCR), issued by US EPA, for the hexavalent chromium violations reported during December 2007 and January 2008. The most recent hexavalent chromium violations, reported on June 24, 2008 and July 1, 2008, will result in DP&L Stuart Station appearing in the April-June 2008 and July-September 2008 QNCRs.

NOTE The page from the January-March 2008 QNCR containing noncompliance information about DP&L Stuart Station is attached. The full report can be viewed at: <http://www.epa.gov/region5/water/weca/reports/oh2qtr08.pdf>.

According to Part III, Item 12 of the NPDES Permit, DP&L is required to notify the Ohio EPA as to the cause of reportable permit limit exceedances and proposed steps taken to eliminate and/or prevent future exceedances. It appears evident, from the information above, that DP&Ls actions, to date, have not adequately resolved the permit limit violations. In your response to this letter, include a detailed report discussing the cause of each of the listed permit limit violations. The report should also include a detailed discussion of actions, including detailed justification, proposed to return to compliance and a time line for completion. Please be aware that the permit limit violations listed above, along with the consecutive QNCR appearances, are significant and serious violations, and formal enforcement action will be recommended if DP&L fails to resolve the hexavalent chromium violations immediately.

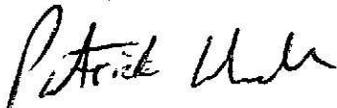
- During the inspection, Troy indicated that DP&L had experienced several instances of severe foam discharging from one or more of the JBR wastewater pits along the south road. These discharges and any future discharges of foam from the JBR wastewater pits need to be reported as unpermitted discharges according to the NPDES Permit. DP&L should also be making every effort to eliminate the cause of the foam to prevent future discharges.

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	June 18, 2008	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Dayton Power & Light J.M. Stuart Generating Station US Route 52, 4 miles east of Aberdeen, Ohio Aberdeen, Ohio 45101	10:30 AM	September 1, 2005
	Exit Time	Permit Expiration Date
	1:00 PM	June 30, 2007

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Troy Williams	937-549-2641
Name, Address and Title of Responsible Official	Phone Number
David Orme, Plant Manager P.O. Box 468 Aberdeen, Ohio 45101	937-549-2641

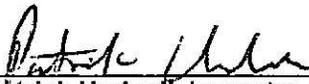
C. AREAS EVALUATED DURING INSPECTION

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

7/15/08

 Date



 Ryszard Lecznar, Reviewer, Ohio EPA, Southeast District Office

7/15/08

 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: f. FGD system now online

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 <u>current and draft NPDES Permits</u>				
e. Permittee is meeting compliance schedule	X			

Comments: a. Hexavalent Chromium and JBR wastepit foam discharges

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available: Generator _____ Dual Feed <u>X</u>	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 <u>3</u> Days/Week <u>7</u>				
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 _____ 800 Number	X			
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

Comments: e. Sending information to Troy Williams to obtain Class A operator certification
 i. JBR wastepit foam discharge
 j. Contacted district representative

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	X			
e. Commercial laboratory used				
1. Parameters analyzed by commercial lab: <u>Metals, O&G, fecals, CBOD5</u>				
2. Lab name: <u>Test America</u>				

Comments:

Part 3, Laboratory - Quality Control/Quality Assurance				Yes	No	N/A	N/E
f. Quality assurance manual provided and maintained				X			
g. Satisfactory calibration and maintenance of instruments and equipment				X			
h. Adequate records maintained				X			
i. Results of latest U.S. EPA quality assurance performance sampling program:							
Date: <u>Study # 27</u>				<u>X</u>	Satisfactory		
					Marginal		
					Unsatisfactory		

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
001	None	None	None	None	None	None	None
002	None	None	None	None	None	None	None
012	None	None	None	None	None	None	None
013	None	None	None	None	None	None	None
019	None	None	None	None	None	None	None
020	None	None	None	None	None	None	None
602	None	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:

 NAME
 LOCATION
 NPDES NUMBER GRANT LIMIT VIOLATION RMC DATE ENFORCEMENT ACTION STATUS ENFORCEMENT STATUS COMMENTS

CITY OF WOOSTER
 WOOSTER
 OH0028185

 NON-COMPLIANT

SOLIDS, TOTAL SUSPENDED 001A 07/31/06 - 08/31/07 NC CONTINUING NONCOMPLIANCE
 NITROGEN, AMMONIA TOTAL (AS 001A 01/31/06 - 09/30/07 NC CONTINUING NONCOMPLIANCE
 BOD, CARBONACEOUS 05 DAY, 20 001A 05/31/06 - 08/31/07 NC CONTINUING NONCOMPLIANCE

CITY OF ZANESVILLE
 ZANESVILLE
 OH0028240

 RESOLVED

BOD, CARBONACEOUS 05 DAY, 20 001A EFF 11/30/07 RE 02/29/08 2C PERMIT EFFLUENT VIOLATION
 BOD, CARBONACEOUS 05 DAY, 20 001A TMC 10/31/07 RE 02/29/08 2C PERMIT EFFLUENT VIOLATION

BOD, CARBONACEOUS 05 DAY, 20 001A 02/28/07 - 09/30/07 RE RESOLVED

DAYTON POWER & LIGHT CO.
 RESOLVED
 OH0004316

 FINAL***

CHROMIUM, HEXAVALENT DISSOLVED 013A TMC 01/31/08 NC 01/31/08 3A1 PERMIT EFF VIOLATION MO AV
 CHROMIUM, HEXAVALENT DISSOLVED 013A TMC 12/31/07 NC 01/31/08 3A1 PERMIT EFF VIOLATION MO AV

DUKE ENERGY OHIO INC
 NON-COMPLIANT
 OH0048836

 FINAL***

3RD RPT CONSTRUCTION PROGRESS SW RPT 02/01/08 NC 03/02/08 3D REPORT OVERDUE

***** SUMMARY SECTION *****