Draft Report Notes Dayton Power & light – O.H. Hutchings Electric Generating Station

EPA: None

State: None

Company: See letter dated December 30, 2010

DP&L

Working For You Today And Tomorrow

December 30, 2010

VIA EMAIL AND CERTIFIED MAIL DELIVERY

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor, N-5237
Arlington, VA 22202-2733

Dear Mr. Hoffman:

The Dayton Power and Light Company (DP&L) has received the draft report related to the site assessment of the coal combustion residual impoundments at the O.H. Hutchings Generating Station. The site assessment was conducted on August 18, 2010 by U.S. EPA's engineering contractor, AMEC Earth & Environmental, Inc. The email notice (dated November 30, 2010) accompanying the draft report requests that comments on the draft report be submitted to USEPA within 30 calendar days of receipt and provides for a business confidentiality claim covering all or part of the information. The following are DP&L's comments on the draft report.

COMMENTS ON THE DRAFT REPORT

Comments on Section 1.0 – Introduction & Project Description

1. Page 4, Section 1.2.1 – references the Ohio Environmental Protection Agency as (EPA). This should be modified to OEPA or Ohio EPA to differentiate it from the United States Environmental Protection Agency.
2. Page 4, Section 1.2.1 – references Ohio EPA Permit No. OH0009261 as having been issued to DP&L. This number is actually the application number; the permit number is 1IB00004*JD.

Comments on Section 2.0 – Field Assessment

1. Page 9, Section 2.3.1 – the last sentence in the section refers to "(cattails shown in photo W-13)". This should be changed to photo W-10.
2. Page 9, Section 2.3.2 – the second paragraph states that flow from the emergency overflow pipe for the West Primary Settling Pond "is discharged into the West Primary Settling Pond". This should say that it is discharged into the East Primary Settling Pond.

Comments on Section 3.0 – Data Evaluation

1. Page 13, Section 3.2 – in the last bullet on the page, "sever" should be "severe".

2. Page 14, Section 3.2.1 – Hydrologic information is not available as this requirement does not apply to these facilities as they receive minimal direct stormwater inflow aside from precipitation directly on the surface of the pond.
3. Page 15, Section 3.3.1 – the third sentence should clarify that only seven borings are shown on Figure 8.
4. Page 16, Section 3.3.1 – It should be noted that the information contained in this section is from an investigation conducted prior to repairs made in c1976 and there presently are no indications of slides or sloughing.
5. Page 17, section 3.5.2 – The next state inspection is not planned until 2014.
6. Page 18, Section 3.5.2 – in item #3 at the top of the page, "Immediately flowing" should be "Immediately following" and "located" should be "locate".
7. Page 18, Section 3.5.2 – in the second sentence of the second full paragraph on the page, "states" should be "state's".
8. Page 19, Section 3.5.2 – in the second bullet under "*Inlet/Outlet Structures*", "regarding" should be "re-grading".
9. Page 19, Section 3.5.2 – in the first bullet under "*Interior Slopes*", "regarded" should be "re-graded".
10. Page 19, Section 3.5.2 – in the second bullet under "*Crest*", "mutilipele" should be "multiple".
11. Page 19, Section 3.5.2 – in the second bullet under "*Exterior Slopes*", "This is" should be "There is".

Comments on Section 4.0 – Data Evaluation

1. Page 21, Section 4.2.1 – As these facilities are upland reservoirs which receive minimal direct stormwater inflow, the watershed is non-existent and therefore this recommended analysis does not apply.
2. Page 22, Section 4.2.3 – As there is no indication of movement, the installation of slope inclinometers is not warranted. Note also that only one primary settling pond is located along the river.

Comments on Appendix A

1. Page 1 of East Primary Settling Pond Impoundment Inspection Form – the Impoundment NPDES Permit # should be 1IB00004*JD.
2. Page 3 of East Primary Settling Pond Impoundment Inspection Form – identifies the Pool Area as being 5.40 acres; Page 5 of the report states the surface area of the East Primary Settling Pond as being 4.5 acres.
3. Page 3 of East Primary Settling Pond Impoundment Inspection Form – "Earthern" should be "Earthen" and "undertermined should be "undetermined".
4. Page 1 of West Primary Settling Pond Impoundment Inspection Form – the Impoundment NPDES Permit # should be 1IB00004*JD.
5. Page 3 of West Primary Settling Pond Impoundment Inspection Form – identifies the Pool Area as being 7.88 acres; Page 5 of the report states the surface area of the West Primary Settling Pond as being 7.3 acres.

6. Page 3 of West Primary Settling Pond Impoundment Inspection Form – "Earthern" should be "Earthen" and "undertermined should be "undetermined".
7. Page 1 of Secondary Settling Pond Impoundment Inspection Form – the Impoundment NPDES Permit # should be 1IB00004*JD.
8. Page 3 of Secondary Settling Pond Impoundment Inspection Form – identifies the Pool Area as being 1.75 acres; Page 6 of the report states the surface area of the Secondary Settling Pond as being 0.3 acres.
9. Page 3 of Secondary Settling Pond Impoundment Inspection Form – "Earthern" should be "Earthen".
10. Page 3 of Secondary Settling Pond Impoundment Inspection Form – identifies the pond as having a clay cap; the pond is still active and does not have a clay cap.

Comments on Appendix B – Photographs

1. Photos E-1 through E-20 – the numbering system for the photos does not correspond to the numbering system as labeled on Figure B-1 (i.e. the photo section includes Photos E-1 but there is no Photo E-1 identified on Figure B-1).
2. Photo E-6 – in the caption "inlet" should be changed to "outlet".
3. Photo E-19 – in the caption "inlet" should be changed to "outlet".
4. Photos W-1 through W-22 – the numbering system for the photos does not correspond to the numbering system as labeled on Figure B-1 (i.e. the photo section includes Photos W-1 but there is no Photo W-1 identified on Figure B-1).
5. Photo W-9 – in the caption "pant" should be changed to "plant".

DP&L appreciates this opportunity to provide comments on the draft impoundment assessment report for O.H. Hutchings Station. If you have any questions please contact Ms. Kris Singleton at (937) 865-6215.

Sincerely,

Mark Sizemore

Mark Sizemore
Operations Manager

Cc: Don Dotson - AMEC
JoAnne Rau – DP&L
Scott Arentsen – DP&L