



HALEY & ALDRICH, INC.  
6500 Rockside Road  
Suite 200  
Cleveland, OH 44131  
216.739.0555

12 October 2016  
File No. 40373-445

Dayton Power & Light Company  
P.O. Box 468  
Aberdeen, Ohio 45101

Attention: Mr. Craig Spangler  
Commodities Manager

Subject: Liner Design Assessment  
Ash Pond, Collection Basin 1, Collection Basin 2  
Killen Station  
Manchester, Ohio

Mr. Spangler:

This letter presents the results of our Liner Design Assessment for the Ash Pond, Collection Basin 1, and Collection Basin 2 located at Dayton Power & Light Company (DP&L) Killen Station near Manchester, Ohio. This work was completed in accordance with the US Environmental Protection Agency's (EPA's) Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals (CCR) from Electric Utilities, 40 CFR Part 257, specifically §257.71(a)(1).

§257.71(a)(1): *No later than October 17, 2016, the owner or operator of an existing CCR surface impoundment must document whether or not such unit was constructed with any one of the following:*

- (i) A liner consisting of a minimum of two feet of compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/sec;*
- (ii) A composite liner that meets the requirements of §257.70(b); or*
- (iii) An alternative composite liner that meets the requirements of §257.70(c).*

While the Ash Pond was constructed with compacted soil and a clay liner, it does not meet the requirements above. Similarly, the miscellaneous clay fill and/or select impervious fill material used for Collection Basin 1 and Collection Basin 2 do not meet the requirements of §257.71(a)(1). Therefore, for purposes of the CCR Rule, the Ash Pond, Collection Basin 1, and Collection Basin 2 are considered unlined CCR surface impoundments and are subject to §257.101(a).

## Professional Engineer Certification

*§257.71(b): The owner or operator of the CCR unit must obtain a certification from a qualified professional engineer attesting that the documentation as to whether a CCR unit meets the requirements of paragraph (a) of this section is accurate.*

I certify that the liner designs of the Ash Pond, Collection Basin1, and Collection Basin 2 do not meet the requirements of the CCR Rule §257.71(a)(1).

Signed:   
Consulting Engineer

Print Name: Steven F. Putrich  
Ohio License No.: 67329  
Title: Vice President  
Company: Haley & Aldrich, Inc.

Professional Engineer's Seal and date:

