

2015

J. M. Stuart Station Carter Hollow Landfill Annual Inspection

EPA Permit to Install: 06-08445

The Dayton Power & Light Company



**Prepared by:
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The Dayton Power & Light Company**

Date: September 29, 2016

Statement of Qualifications

I am a practicing Civil/Geotechnical Engineer registered with the State of Ohio employed by the Dayton Power & Light Company. I am experienced in the design, maintenance and operation of landfills.

Carter Hollow Landfill – Annual Inspection 40 CFR 257.84(b)

According to the Federal Coal Combustion Residuals (CCR) Rule, the definition of an existing CCR landfill means a CCR landfill that receives CCR both before and after October 19, 2015, or for which construction commenced prior to October 19, 2015 and receives CCR on or after October 19, 2015. A CCR landfill has commenced construction if the owner or operator has obtained the federal, state, and local approvals or permits necessary to begin physical construction and a continuous on-site, physical construction program had begun prior to October 19, 2015. Carter Hollow Landfill obtained permits and commenced construction prior to October 19, 2015. To date, Carter Hollow has not received CCR. By definition, Carter Hollow is an existing landfill.

An Annual inspection by a qualified professional engineer for existing landfills is required by 257.84(b)(1) to ensure that the design, construction, operation, and maintenance of the CCR unit is consistent with recognized and generally accepted good engineering standards. The inspection must, at a minimum, include:

- (i) A review of available information regarding the status and condition of the CCR unit, including, but not limited to, files available in the operating record (e.g., the results of inspections by a qualified person, and results of previous annual inspections); and
 - This is the initial annual inspection. The landfill is presently under construction and has not yet received CCR for disposal.
- (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.
 - The landfill presently under construction is inspected weekly and there are no current issues.

(b)(2) *Inspection report.* A qualified professional engineer must prepare a report following each inspection that addresses the following:

- (i) Any changes in geometry of the structure since the previous annual inspection;
 - This is the initial annual inspection. The landfill is presently under construction and has not yet received CCR for disposal.
- (ii) The approximate volume of CCR contained in the unit at the time of the inspection;
 - This is the initial annual inspection. The landfill is presently under construction and has not yet received CCR for disposal.

- (iii) Any appearances of an actual or potential structural weakness of the CCR unit, in addition to any existing conditions that are disrupting or have the potential to disrupt the operation and safety of the CCR unit; and
 - This is the initial annual inspection. The landfill is presently under construction and has not yet received CCR for disposal. No indication was found of an actual or potential structural weakness of the CCR unit or any existing condition that was disrupting or had the potential to disrupt the operation and safety of the CCR unit and appurtenant structures.

- (iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection;
 - This is the initial annual inspection. The landfill is presently under construction and has not yet received CCR for disposal.