

2016

**J. M. Stuart Station
Carter Hollow Landfill**

EPA Permit to Install: 06-08445
The Dayton Power & Light Company



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

Date: December 21, 2016

Purpose

I have conducted the following annual inspection in compliance of the Federal CCR Rule, 40 CFR Part 257.

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.

Review of Landfill Documentation [§ 257.84(b)(1)(i)]

Design, History, and Operation of the Facility

Carter Hollow Landfill No. was permitted in 2012 as a residual waste landfill. This facility is valley fill design with 2½:1 side slopes. The facility is designed with an under drain system, 3 feet of re-compacted soil liner, geosynthetic, leachate collection piping, drainage media and 18 inches of protective cover. Construction of phase 1A was completed this year while work continues on subsequent phases. The facility is in the process of certification and application for the operating license. The facility is permitted to receive approximately 20 million tons of CCR material when all phases are complete. First receipt of CCR material could occur in 2017.

Provisions in the design redirect all surface water around the landfill so that there will be no run-on water. This landfill is planned to receive predominately gypsum from the flue gas desulfurization systems at the Stuart and Killen Stations but is also permitted to receive fly ash and bottom ash.

Periodic Inspections

A thorough review of weekly facility inspections was conducted. Periodic inspections do not indicate any potential for structural instabilities.

Visual Inspection of Landfill [§ 257.84(b)(1)(ii)]

Carter Hollow Landfill is in good structural condition. There are no maintenance items at this time. Much of the vegetative cover was recently seeded and should be monitored to ensure that a healthy stand of grass is established.

Changes in Geometry [§ 257.84(b)(2)(i)]

There were no changes to geometry that would indicate structural weakness or failure. Structural fill, liner, leachate media and protective cover have been completed in Phase 1A.

Volume of CCR [§ 257.84(b)(2)(ii)]

No waste material has been placed in the Carter Hollow Landfill as of this time

Structural Weakness [§ 257.84(b)(2)(iii)]

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.

Other Changes [§ 257.84(b)(2)(iv)]

No changes were found to the CCR unit which could affect the stability or operation of the CCR Unit since the previous annual inspection.

Appendix A

CCR Rule Requirements for Landfill Inspections

§257.84 Inspection requirements for CCR landfills.

- (a) *Inspections by a qualified person.*
 - (1) All CCR landfills and any lateral expansion of a CCR landfill must be examined by a qualified person as follows:
 - (i) At intervals not exceeding seven days, inspect for any appearances of actual or potential structural weakness and other conditions which are disrupting or have the potential to disrupt the operation or safety of the CCR unit; and
 - (ii) The results of the inspection by a qualified person must be recorded in the facility's operating record as required by §257.105(g)(8).
 - (2) *Timeframes for inspections by a qualified person—*
 - (i) *Existing CCR landfills.* The owner or operator of the CCR unit must initiate the inspections required under paragraph (a) of this section no later than October 19, 2015.
 - (ii) *New CCR landfills and any lateral expansion of a CCR landfill.* The owner or operator of the CCR unit must initiate the inspections required under paragraph (a) of this section upon initial receipt of CCR by the CCR unit.
- (b) *Annual inspections by a qualified professional engineer.*
 - (1) Existing and new CCR landfills and any lateral expansion of a CCR landfill must be inspected on a periodic basis by a qualified professional engineer 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
 - (ii) A visual inspection of the CCR unit to identify signs of distress or malfunction of the CCR unit.
 - (2) *Inspection report.* The 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;
 - (ii) The approximate volume of CCR contained in the unit at the time of the inspection;
 - (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
 - (iv) Any other change(s) which may have affected the stability or operation of the CCR unit since the previous annual inspection.
 - (3) *Timeframes for conducting the initial inspection—*
 - (i) *Existing CCR landfills.* The owner or operator of the CCR unit must complete the initial inspection required by paragraphs (b)(1) and (2) of this section no later than January 19, 2016.
 - (ii) *New CCR landfills and any lateral expansion of a CCR landfill.* The owner or operator of the CCR unit must complete the initial annual inspection required by paragraphs (b)(1) and (2) of this section no later than 14 months following the date of initial receipt of CCR in the CCR unit.
 - (4) *Frequency of inspections.* The owner or operator of the CCR unit must conduct the inspection required by paragraphs (b)(1) and (2) of this section on an annual basis. The date of completing the initial inspection report is the basis for establishing the deadline to

complete the first subsequent inspection. Any required inspection may be conducted prior to the required deadline provided the owner or operator places the completed inspection report into the facility's operating record within a reasonable amount of time. In all cases, the deadline for completing subsequent inspection reports is based on the date of completing the previous inspection report. For purposes of this section, the owner or operator has completed an inspection when the inspection report has been placed in the facility's operating record as required by §257.105(g)(9).

- (5) If a deficiency or release is identified during an inspection, the owner or operator must remedy the deficiency or release as soon as feasible and prepare documentation detailing the corrective measures taken.
- (c) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in §257.105(g), the notification requirements specified in §257.106(g), and the internet requirements specified in §257.107(g).

[80 FR 21468, Apr. 17, 2015, as amended at 80 FR 37992, July 2, 2015]

Appendix B

Reference Documents Reviewed

- ❖ Landfill permit documents, CEC
- ❖ 2016 weekly inspection reports, DP&L
- ❖ 2015 J. M. Stuart Station Carter Hollow Annual Inspection Report, DP&L
- ❖ Run-On and Run-Off Control System Plan, CEC, 2016
- ❖ Drawings
 - Carter Hollow Landfill Permit Drawings
 - Carter Hollow Landfill Construction Drawings.

Appendix C
Inspection Check List

Landfill Field Inspection Report

LANDFILL ANNUAL FIELD INSPECTION FORM

Unit Name: Carter Hollow Landfill

Facility Name: J.M. Stuart Station

Permits: 06-08445

CCR Unit

ACTION

Bottom Liner Material: Compacted clay < 1X10⁻⁷ Thickness: 36 inches

Leachate Drainage Media: Bottom ash/stone Thickness: 12 inches

Cover Material: Compacted clay < 1X10⁻⁷ Thickness: 24 inches

Vegetative Cover Material: 6 inches

Other details: The bottom liner is sloped to the south for drainage.

Inspection Date(s): November 28, 2016

Weather/Surface Conditions During Inspection: clear, dry, temperatures 50's F

NONE
MONITOR
MAINTENANCE
ENGINEER

PERMANENT COVER

Gradient: Horizontal: 3 Vertical: 1 (est. meas.)

VEGETATION

Trees:

DESCRIPTION AND LOCATION:

Brush:

DESCRIPTION AND LOCATION:

Ground Cover:

DESCRIPTION: Protective cover

CONDITION: Protective cover is in place to protect the liner from freezing. No

waste has been placed so there is no temporary or permanent cover at this time.

EROSION

DESCRIPTION AND LOCATION:

No erosion is evident at this time.

INSTABILITIES: (SLIDES, CRACKS, BULGES, etc.)

SLIDES/SLOUGHS:

DESCRIPTION AND LOCATION:

CRACKS:

DESCRIPTION AND LOCATION:

BULGES

DESCRIPTION AND LOCATION:

OTHER

DESCRIPTION AND LOCATION:

SEEPAGE/WET AREA

DESCRIPTION AND LOCATION:

MONITORING INSTRUMENTATION:

DESCRIPTION: Groundwater monitoring wells are located at the edges of the landfill according to the permit. The underdrain directly under the cell will also be monitored.

CONDITION: Monitoring instruments are in good condition.

OTHER (rodent burrows, ruts, etc.)

DESCRIPTION AND LOCATION:

DESCRIPTION AND LOCATION:

ACTION

NONE
MONITOR
MAINTENANCE
ENGINEER

DESCRIPTION AND LOCATION:

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION AND LOCATION:

NONE MONITOR MAINTENANCE ENGINEER

HYDRAULIC STRUCTURES

LEACHATE DRAINS

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION: Chimney drains convey contact water from the surface to the leachate collection system. Leachate is collected in a central pipeline that conveys leachate/contact water to the leachate basin. Another pipe conveys leachate/contact water from the basin to the Landfill No. 9 Retention Pond for additional retention or treatment prior to discharge in the Ohio River.

CONDITION: System is in good condition.

BENCH DRAINS

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION: Benches will be drained with surface channels no benches have been installed at this time.

CONDITION: Good

OBSTRUCTION NOTED: (YES NO) DESCRIBE IF YES:

PERIMETER DITCH

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION: The landfill is designed with a perimeter ditch to divert run-on storm water away from the cell.

CONDITION: This ditch is in good condition.

SEEPAGE NOTED: (YES NO) DESCRIBE IF YES:

WATER COLLECTION POND

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION: The leachate/contact water pipe discharges to the leachate/contact water basin. This basin is lined with 36 inches of re-compacted soil liner, 30 mill synthetic liner and bottom ash/stone protective cover.

CONDITION: Pond is in good condition

EROSION NOTED: (YES NO) DESCRIBE IF YES:

INLET

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION: Not applicable.

CONDITION:

OBSTRUCTION NOTED: (YES NO) DESCRIBE IF YES:

FOREBAY

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION: Not applicable.

CONDITION:

OUTLET STRUCTURE:

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION:

CONDITION:

OBSTRUCTION NOTED: (YES NO) DESCRIBE IF YES:

CONDUIT

NONE MONITOR MAINTENANCE ENGINEER

DESCRIPTION: 24" HDPE pipe conveys water from the leachate/contact water basins to the Landfill No. 9 Perimeter ditch.

CONDITION: Pipe is in good condition.

ACTION

NONE

MONITOR

MAINTENANCE

ENGINEER

DISCHARGE STRUCTURE:

DESCRIPTION: A structure is in place to discharge leachate/contact water into the perimeter ditch. Provision is made for NPDES sample collection and flow measurement.

CONDITION: Good condition.

Appendix D

CCR Unit Maintenance Recommendations

1. No maintenance recommendations are made for this CCR Unit.

Continued Monitoring

1. Monitor vegetation around the landfill to ensure that a healthy stand of grass is established.