



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
Pond 3A, Pond 5, Pond 6, Pond 7, Pond 10
J.M. Stuart Station
Aberdeen, Ohio

Mr. Spangler:

This letter presents the results of our Liner Design Assessment for Pond 3A, Pond 5, Pond 6, Pond 7, and Pond 10 located at Dayton Power & Light Company (DP&L) J.M. Stuart Station in Aberdeen, 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 1×10^{-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).*

Pond 5, Pond 6, and Pond 7 were constructed with earthen dikes and, therefore, do not meet the above liner requirements. Pond 3A was constructed over existing clay cover that was placed above an ash disposal basin. Furthermore, the bottom liner of Pond 3A was replaced in 2012. Pond 3A does not meet the requirements of §257.71(a)(1). Similarly, the clay liner for Pond 10 does not meet the requirements of §257.71(a)(1). Therefore, for purposes of the CCR Rule, Pond 3A, Pond 5, Pond 6, Pond 7, and Pond 10 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 Pond 3A, Pond 5, Pond 6, Pond 7, and Pond 10 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:

