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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 15, 2009

RE: ASHTABULA COUNTY
NORFOLK SOUTHERN
ASHTABULA COAL DOCK
NPDES PERMIT NO. OH0064122
OHIO EPA PERMIT NO. 3IT00011

Mr. Paul Zottola
Engineer Environmental Operations
Norfolk Southern Corporation
Environmental Protection
425 Holiday Drive
Pittsburgh, PA 15220

Dear Mr. Zottola:

Inspections of the Ashtabula Coal Dock were conducted by the undersigned on October 29 and November 12, 2009. Mr. Tony Becker, Ohio EPA Division of Air Pollution Control, participated in the November 12th inspection. In addition to you, the facility was represented by Messrs. Charlie Jones and John Gegan. The purpose of the inspections was to evaluate the facility's compliance status with respect to the terms and conditions of the NPDES permit and Ohio Revised Code (ORC) Chapter 6111. The inspection consisted of an evaluation of the facility's wastewater treatment system and tour of the facility grounds. A point of emphasis was to evaluate the status of improvements aimed at addressing the leakage issues associated with the coal conveyor bridge.

A timely NPDES permit renewal application was received by this office on September 29, 2009. Information gathered during the inspections will be utilized in determining the renewal status of the NPDES permit.

Facility Description:

The coal dock is located on Lake Erie at the mouth of the Ashtabula River. The facility serves as a transload point for coal destined for electric generating utilities and cement producers within the Great Lakes states and Canada. Coal arrives at the eastside of the facility and is rotary dumped from the rail cars and placed onto a belt conveyor. The conveyor bridge transports the coal across the Ashtabula River for storage on the facility grounds or loading directly into self-unloading vessels. The annual through-put capacity for the site is seven million tons. Onsite storage is available for up to 1.2 million tons.

Wastewater Treatment/Management:

The wastewater management system consists of a combination of conveyance ditches and pump stations that collect contaminated storm water and dust suppressant runoff water from coal pile storage and handling areas on the west side of the facility. The collected water is conveyed to the facility's treatment system prior to discharging to Lake Erie via Outfall 001. The treatment system relies on a combination of equalization, chemical neutralization, sedimentation, and filtration to treat the wastewater.

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Citing a need for improved wastewater management on the east side of the river, a Permit to Install (PTI) was issued to the facility on June 9, 2009 to construct a 40,000 gallon wash water holding tank. Once completed, the tank will collect water generated by the cleaning and maintenance of the eastern portion of the conveyor bridge and associated transportation structures. The wash events occur approximately 3 times per month and are necessary to remove accumulated coal dust for fire/explosion prevention purposes. The collected water will be hauled to the existing treatment system. We understand that the contract for the holding tank has been awarded.

Inspection Findings/Compliance Review:

At the time of the inspection, the following observations and comments were noted:

1. The general operation and maintenance of the wastewater treatment system was satisfactory. The effluent was clear with no visual evidence of adverse impact at Outfall 001.
2. The following major improvements to the conveyor bridge were noted:
 - A new conveyor belt was installed in the February - March 2009 time period. Coupled with other improvements to the conveyor, e.g. new rollers, the result has been an overall improvement in transport efficiency and, hence, a reduction in the amount of material that must be removed during cleaning.
 - The wash water drains under the bridge were upgraded from 6-inch to 10-inch diameter PVC pipe. Additionally, efforts were made to eliminate flow obstructions, e.g. sharp bends, in the drain lines.
 - Repairs, i.e. adding rubber gaskets, applying foam sealant, etc., have been ongoing for the identified internal leaks along the bridge floor and side walls. We understand that current plans also include the replacement of older sections of the floor.
3. As evidenced in the attached pictures, some wash water was escaping through expansion joints, ventilation holes, hatch openings, and seams in the bridge. While the present improvements have significantly curtailed the releases, they have not resulted in the elimination of the unauthorized discharge of wash water into waters of the state. These releases appear to be most evident along the flat center section of bridge, which is directly over the river. It is worth noting that the present drainage system does not extend to this section.
4. The facility's Storm Water Pollution Prevent Plan (SWPPP) is scheduled to be updated once the NPDES permit is reissued.

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In addition to the above, a review of the facility's discharge monitoring reports (DMRs) received by Ohio EPA for the period, November 2008 - October 2009, was performed. The review indicated that the discharge at Outfall 001 has been in substantial compliance with the NPDES permit effluent limitations.

Should you have any questions or comments regarding this letter, please contact this office.

Respectfully,



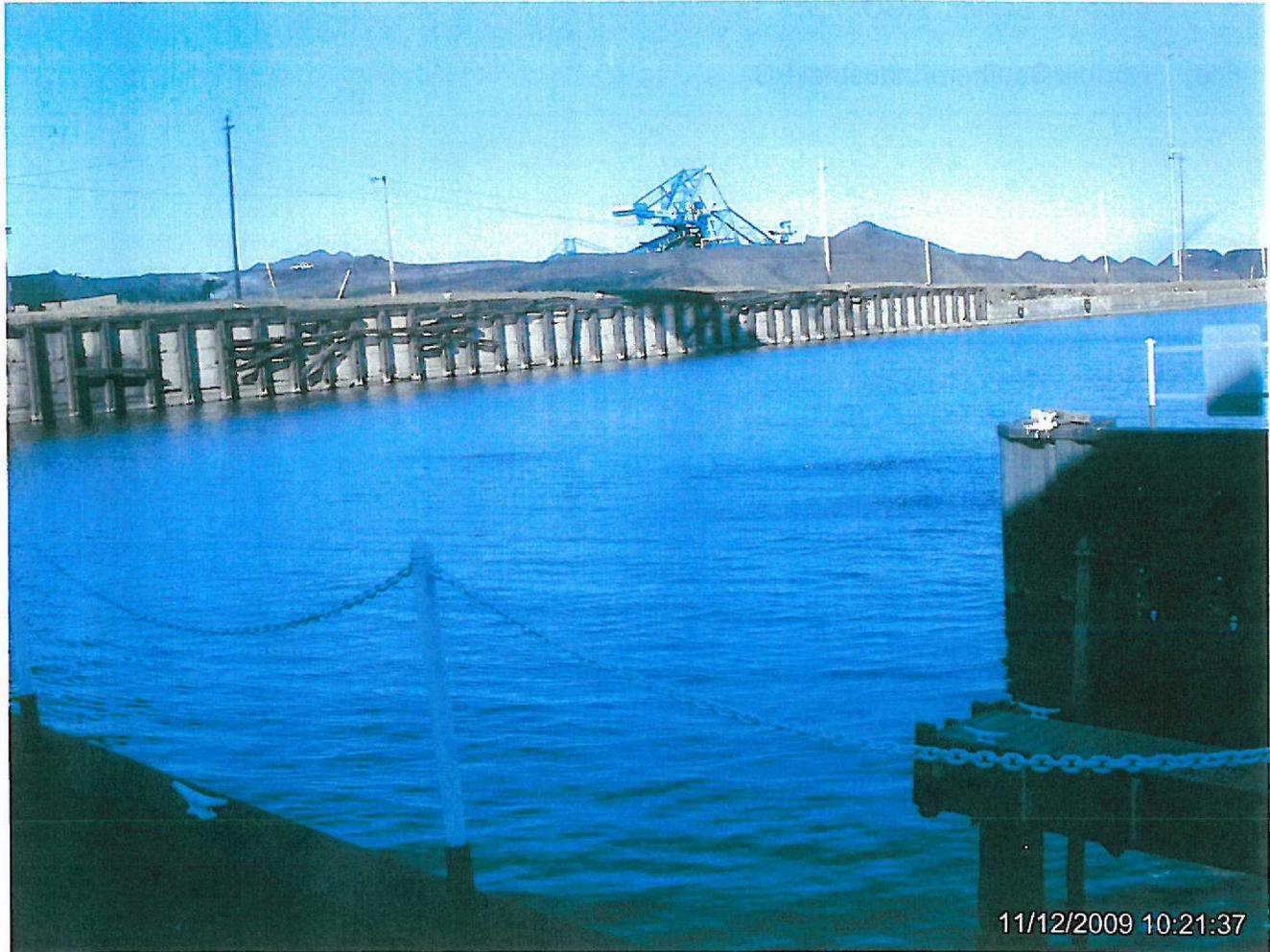
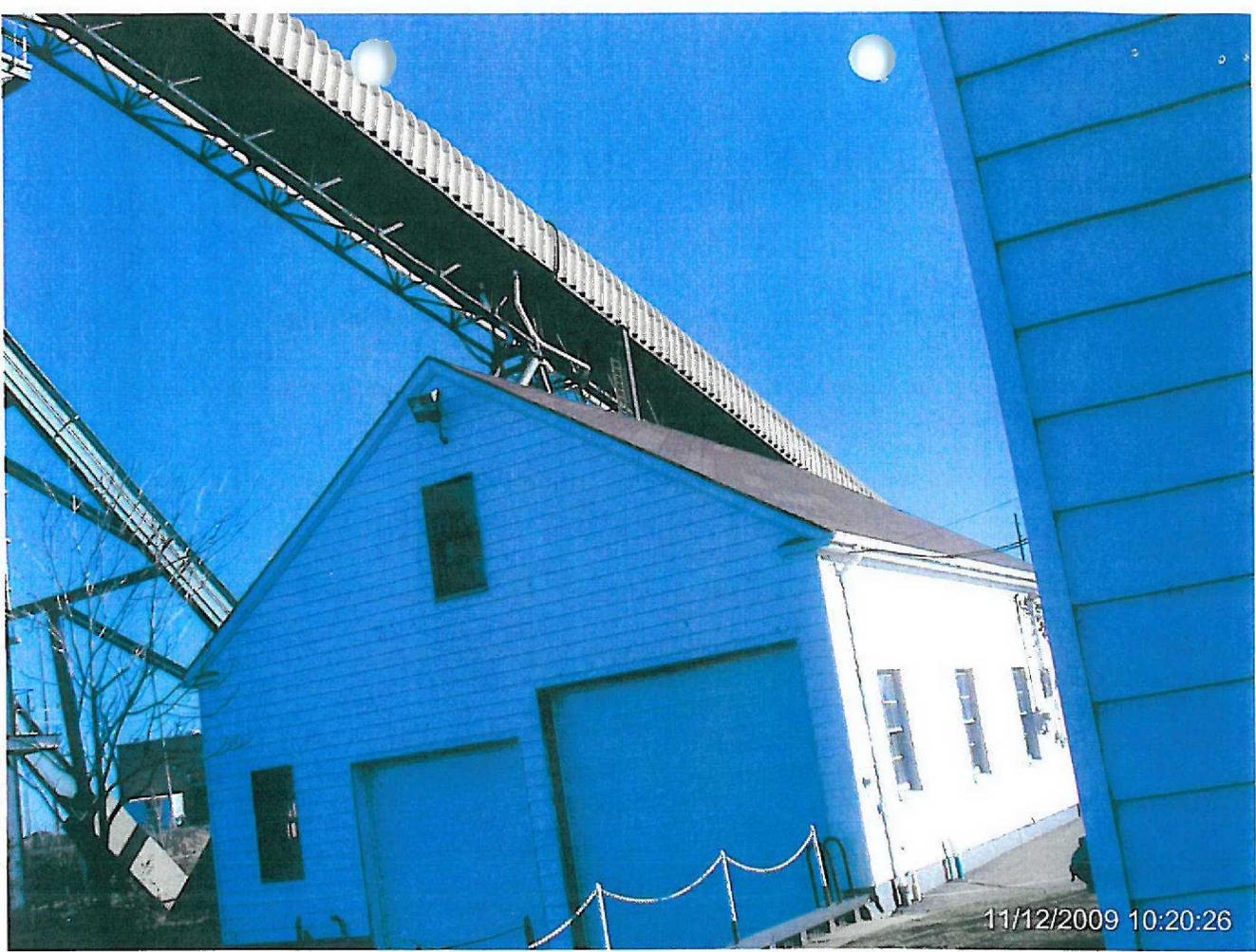
Ermelindo Gomes
Environmental Engineer
Division of Surface Water

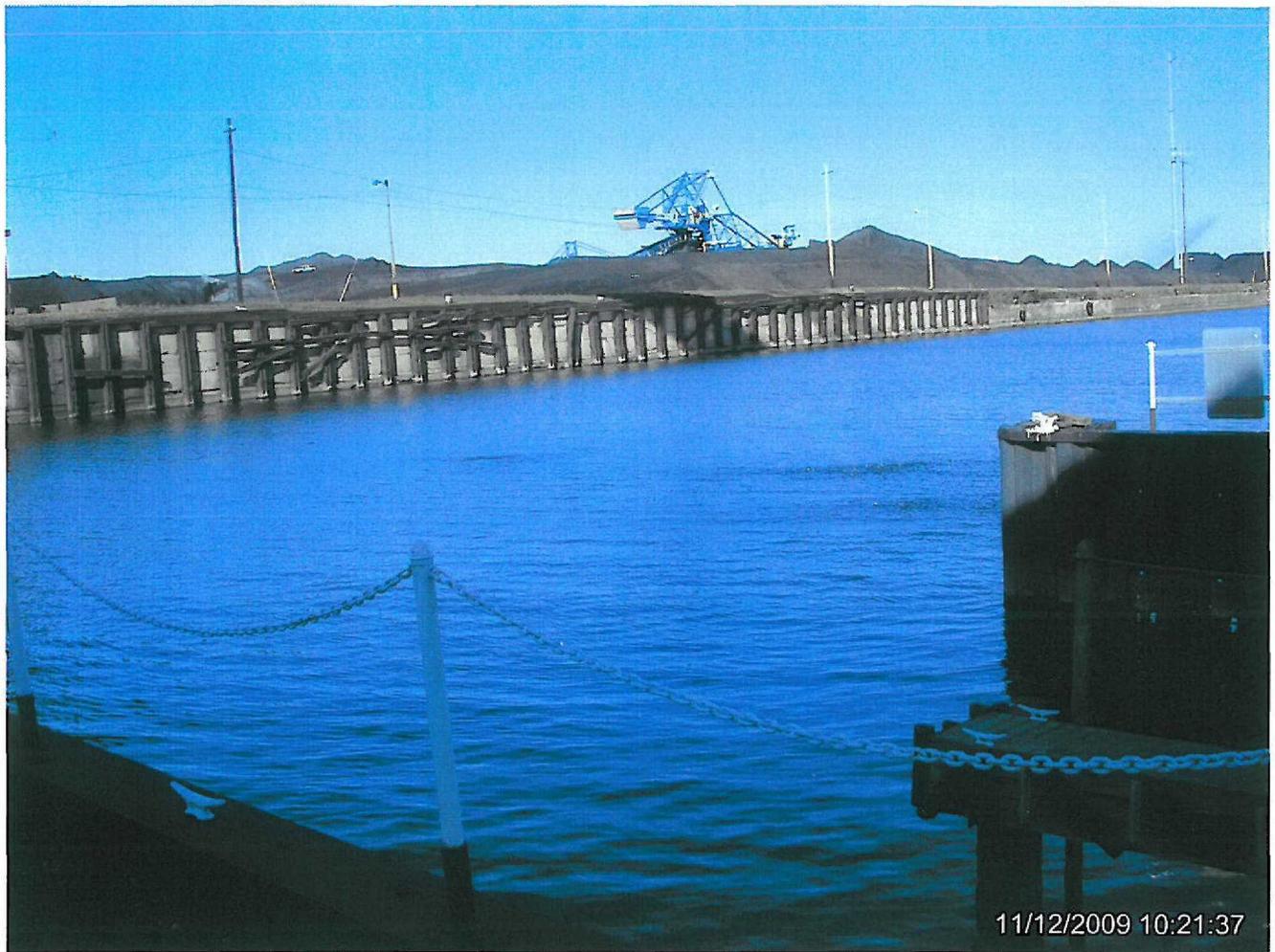
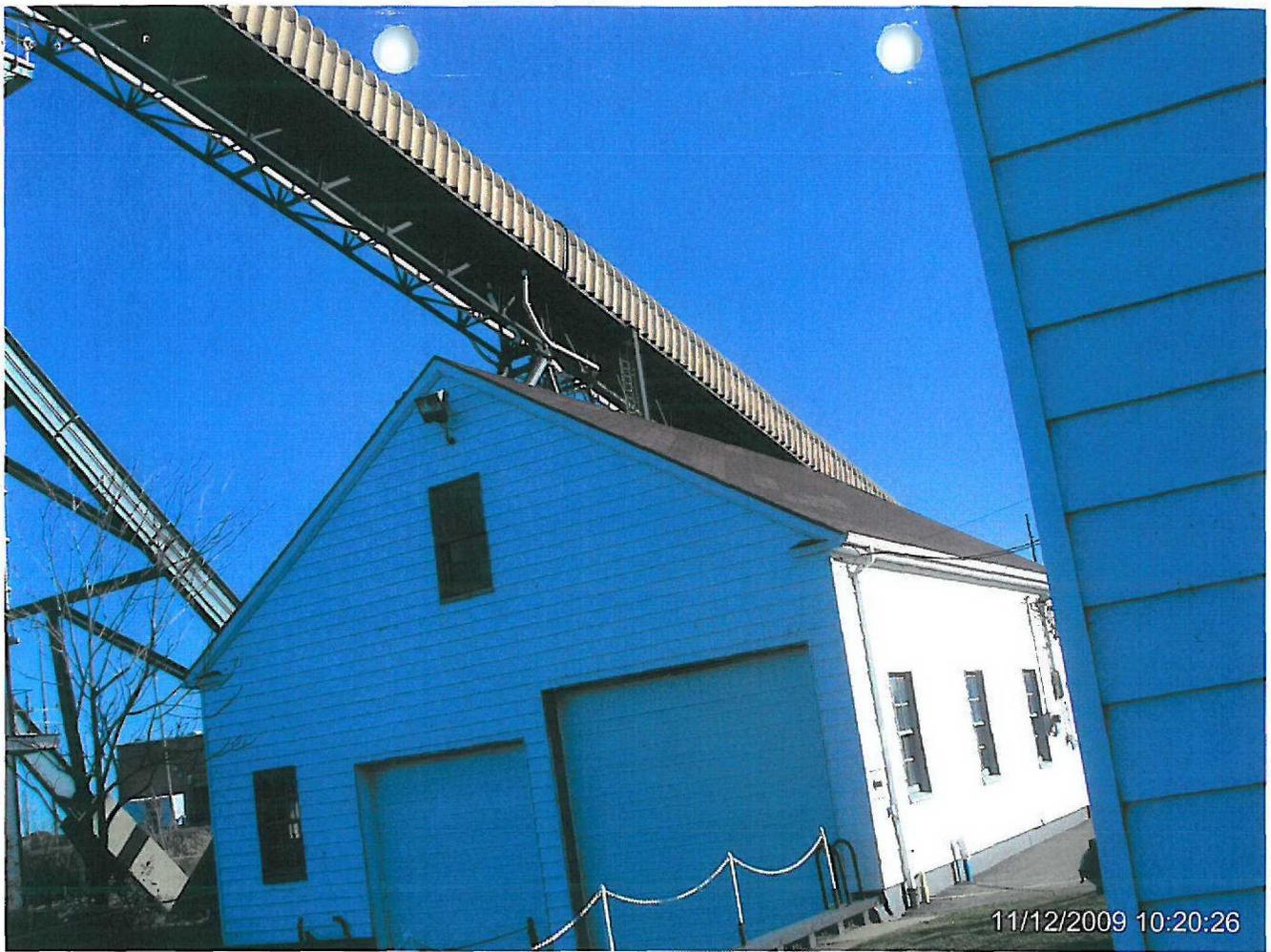
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Attachment: Pictures

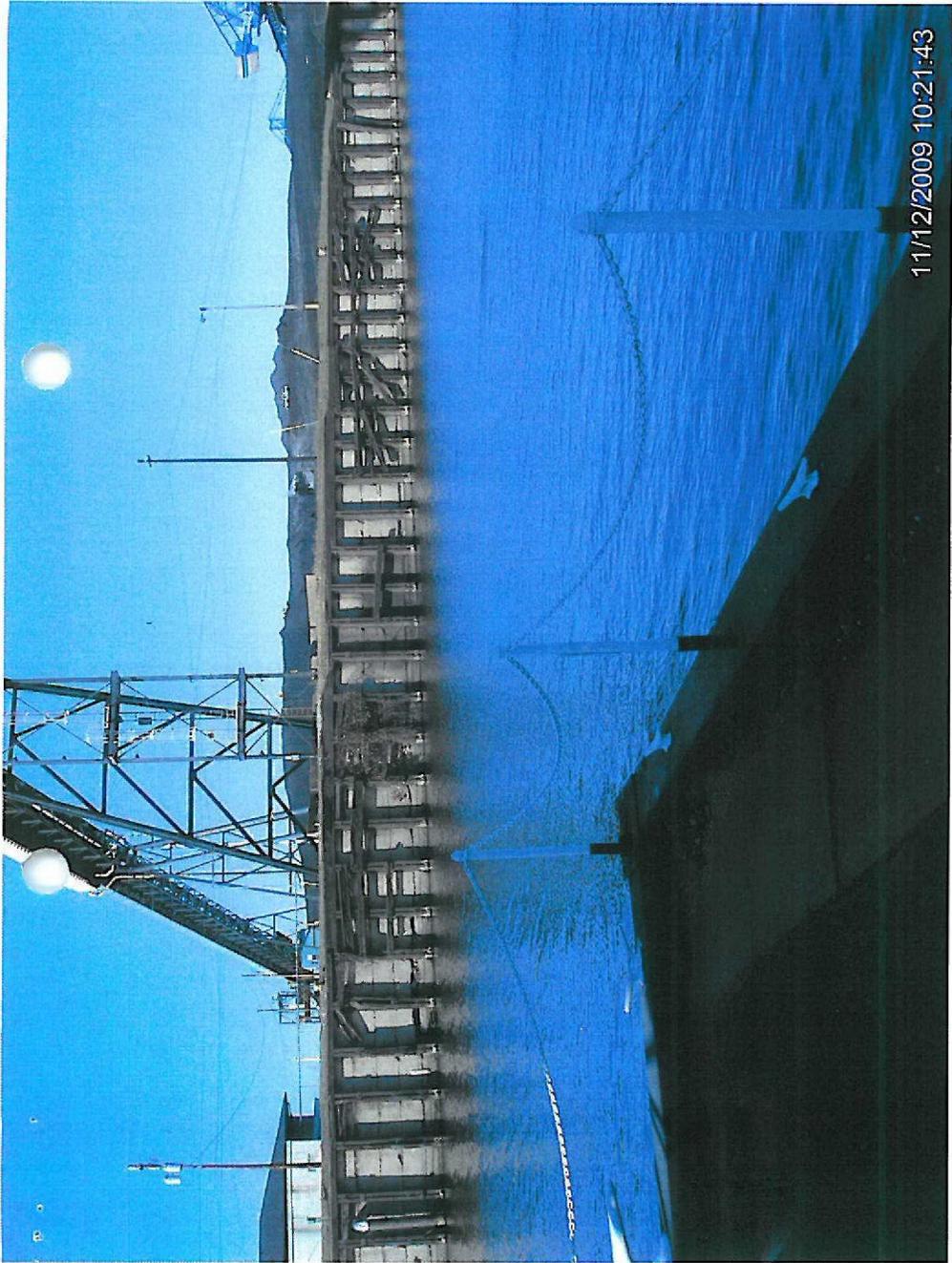
cc: Charlie Jones, NS Ashtabula Coal Dock
Bill Skowronski, District Chief, Ohio EPA, NEDO
Thomas Behlen, AGO

File: Norfolk Southern/Industrial/PC

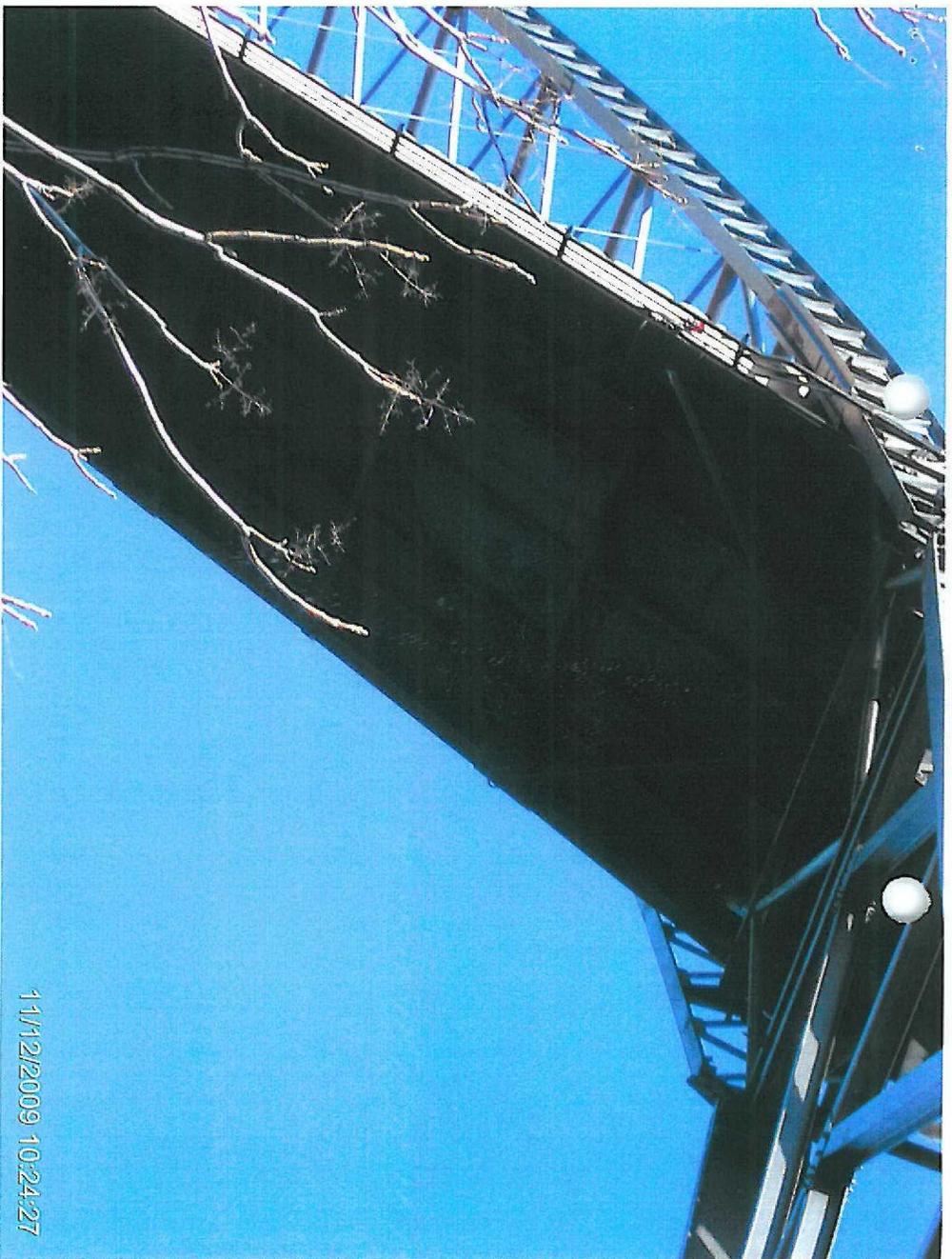












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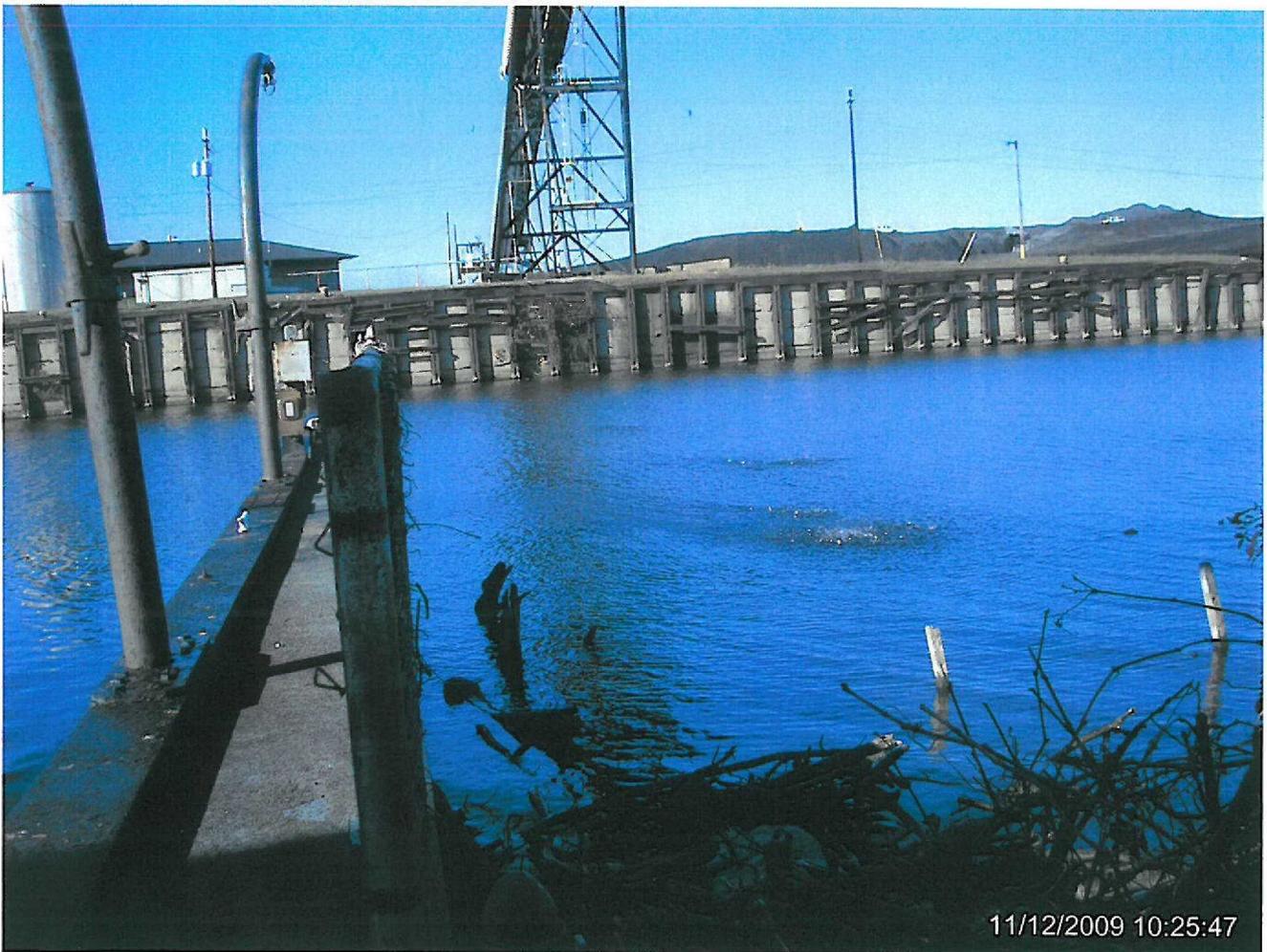
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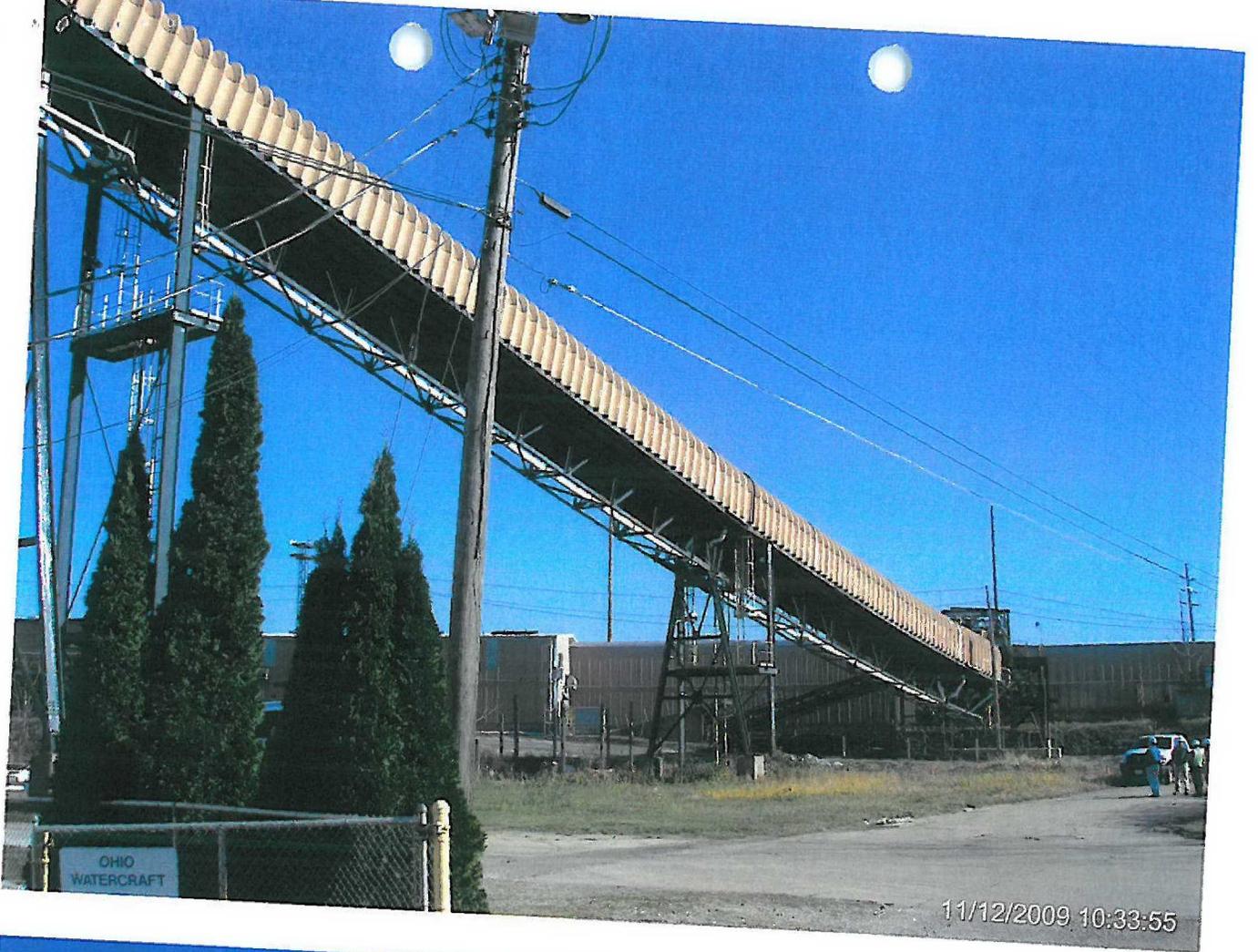




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