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September 27, 2010

RE: NORFOLK SOUTHERN CORPORATION
ASHTABULA COAL DOCK
OHIO EPA PERMIT 3IT00011
ASHTABULA CITY, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. C. Russell McDaniel, P.E.
Director of Environmental Engineering, Remediation and Compliance
Norfolk Southern Corporation
1200 Peachtree Street NE, Box 13
Atlanta, GA 30309

Dear Mr. McDaniel:

In conjunction with our meeting on September 14, 2010, a limited scope site inspection was conducted at the above referenced facility at 645 East 6th Street (north end of Ferry Drive), City of Ashtabula, Ashtabula County. Representing Ohio EPA during the inspection included John Schmidt, Erm Gomes, and Tomas Parry. Paul Zottola and John Gegan represented Norfolk Southern Corp. (NS) during the inspection. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit for the areas examined. The last compliance inspection was conducted on November 12, 2009. The inspection consisted of an evaluation of the facility's wastewater treatment system and brief 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.

Industrial process wastewater is limited to dust suppression runoff water and storm water runoff collected from the facility used to store incoming and outgoing coal for electric generating utilities and cement producers in 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. Fines are accumulated at conveyor transfer points. 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. On-site storage is available for up to 1.2 million tons. Storm water is collected through a series of ditches and pump stations located throughout the facility. Sanitary waste is limited to employee restrooms and locker rooms, and is collected and flows to sanitary sewers owned by the City of Ashtabula.

Storm water management includes water from dust suppressant activities, bridge washing activities, building footer drains, runoff from paved areas of the facility, and various coal stockpiles. Some roof drains are routed directly to Lake Erie and are not intercepted by the storm water collection and treatment system. Collected storm water is routed to ditches around the perimeter of the facility and is conveyed through pump stations throughout the facility through additional ditches and collected in a preliminary treatment siltation pond. Water flows from the siltation basin to a one million gallon equalization basin. Influent flow and pH are monitored. Wastewater treatment includes neutralization with potash in the equalization basin and with caustic soda (20% solution) in a clarifier, polymer to aid in settling (being phased out), and two sand filter towers with flow metering and pH metering prior to discharge. Additional components include a polymer tank, caustic tank and an empty auxiliary tank. Sludge is removed from the clarifier on a weekly basis and placed in covered sludge

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drying beds. Dried sludge containing polymer is removed to a landfill, and sludge not containing polymer is envisioned to be reincorporated back into the coal stockpile. Final discharge is to a wetland area and Lake Erie via Outfall 001.

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, coal unloading building, 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 via a vac truck to the existing treatment system. The holding tank was under construction at the time of the inspection.

Observations

The following observations were made during the inspection:

1. The plant operates in batches as needed with the plant flow ranging from about 400 gpm to a maximum of about 700 gpm. The plant design capacity is 1.0 MGD.

2. The plant was found in overall satisfactory condition. Plant equipment was found reasonably clean and operational. Mr. Zottola and Mr. Gegan indicated that the equalization basin and siltation basin are dredged as needed.

3. A log book of repairs and observations is maintained at the WWTP. Greg Forillo performs routine operations at the WWTP, monitors the facility, and collects samples. Most analytical work is performed by EA Group.

4. The clarifier was observed in good working order. Sludge is removed from the system routinely.

5. The sampler was in use at the time of the inspection. Mr. Gegan noted that the sampler collects a 24-hour time-based composite sample.

6. The final discharge was observed as of satisfactory visual quality.

7. The following major improvements to the conveyor bridge and associated systems were noted:

    a. 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.

    b. The wash water drains under the bridge were upgraded from 6-inch to 10-inch diameter PVC pipe with flexible connections. Additionally, efforts were made to

eliminate flow obstructions, e.g. sharp bends, in the drain lines by replacing 90° elbows with 45° elbows where feasible.

c. 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.

d. Construction was underway for the new 40,000 gallon holding tank that will collect storm water and wash water generated from the coal unloading operations, conveyor system between the coal unloading building and the large conveyor bridge, and eastern half of the conveyor bridge.

e. A new vac truck was purchased and on site for transporting collected waste water from the east side of the facility to the treatment facility located on the west side of the facility.

NPDES Permit Compliance Review

Norfolk Southern Corp. - Ashtabula Coal Dock operates under Permit 3IT00011*DD. A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period November 1, 2009 through September 1, 2010 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

Limit Violations

The following limit violations were noted for the period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	1D Conc	50	51.	12/29/2009
001	00400	pH	1D Conc	6.5	6.2	7/28/2010

A January 21, 2010 written explanation regarding the December 2009 exceedence event was received by Ohio EPA on January 28, 2010; however, no similar response was received for the July 2010 exceedence event. A written explanation as to why the July 2010 exceedence event occurred must be provided, along with measures to ensure that they are not repeated.

Reporting Violations

No reporting code violations were noted; however, the following reporting frequency violation was noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
001	00530	Total Suspended Solids	1/Week	1	0	07/22/2010

A written explanation as to why this event occurred must be provided along with measures to ensure that it is not repeated.

If you feel some of Ohio EPA's reporting records are in error, you may wish to re-enter this information through the eDMR system. Ohio EPA's eDMR support staff may also be available to assist you in this matter. E-mailing questions to James.Roberts@epa.state.oh.us is the quickest way to get a response if you have a specific question with the eDMR program or how to make corrections to what is reported in the eDMR program.

Other Violations

Composite Sampler: Part I C, Item 2 and Part II, Item E of your NPDES permit requires that composite samples be collected over a 24-hour period and proportionate in volume to the waste water flow rate at the time of sampling. Your sampler must be able to collect samples proportionate to the flow of the final effluent. Most composite samplers have provisions of collecting either time-weighted samples or flow proportionate samples, and flow proportionate sampling requires a signal from the flow meter. Please provide documentation that sampler has been converted to a flow-proportionate sampler.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions that have been or will be taken to correct the above noncompliance. Your response to this letter should include the dates that the actions have been or will be completed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,

John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cl

pc: Paul Zottola, Norfolk Southern
Charlie Jones, Norfolk Southern
Bill Skowronski, District Chief, Ohio EPA, NEDO
Martha Horvitz, Ohio EPA Legal
David Dokko, AGO-EES

File: Industrial P/C – Norfolk Southern Railway (Ashtabula)