



State of Ohio Environmental Protection Agency

Northeast District Office

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

September 16, 2008

RE: ASHTABULA COUNTY
NORFOLK SOUTHERN
RAILWAY CO.
PERMIT 3IT00011
COMPLIANCE INSPECTION

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

Dear Mr. Zottola:

On September 8, 2008, a compliance inspection of the above facility was performed by the undersigned and Mr. Bill Skowronski. The purpose of the inspection was to get a complete overview of the operations of the facility, inspect and discuss issues on the eastern side of the facility, and to see the operation of the wastewater collection and treatment system. Also, as part of the compliance review of the facility, the Discharge Monitoring Reports were reviewed for any monitoring violations for the period of January 2008 through August 2008.

The monitoring results show that three violations have occurred during the above noted time period. On March 31, 2008, both flow and pH frequency violations were reported and on May 1, 2008, a limit violation for pH was reported.

The following summarizes discussions and findings during the inspection of the facility:

- The inspection of the facility started with the eastern side where the coal hopper exists for dumping of coal from railroad cars. From this area, the coal bridge originates and extends over the Ashtabula River. It was noted that this area had been greatly improved since the complaint investigation on June 10, 2008. All loose coal was removed and the area was excavated to create a berm around the base of the bridge and dock area. A dry sump was present to aid in the collection of any storm water drainage to the area to be piped directly into the coal hopper. The roadway was cleared of all coal dust debris that had collected on the road and adjacent areas. Stabilization material (gravel/stone) had been added along the edges of the road and bermed area.
- Following the bermed area inspection, the piping network under the bridge was then checked. As indicated in your letter dated July 31, 2008, the piping network

was dismantled and cleaned, portions replaced and reinforcement added. During the inspection, Mr. Charlie Jones and Mr. Bryant Johnson indicated that the piping was intact; however, one joint was visibly disconnected (see attached photo #1) and was pointed out to the facility. Wastewater drainage was noted on the ground below the pipe break as well as some coal residuals (see photos #2 and 3). Per discussion with you on July 23, 2008, and as indicated by the facility during the inspection, leakage from the bridge does continue to occur, but from only one source – doors to the coal belt which are located in eight locations across the bridge expanse. It was indicated that these doors are not located over the river or the ODNR facility, but rather at support locations. It was also indicated that the leakage only occurs when the bridge is being sprayed to eliminate the coal dust buildup in the belt area and not at any other time.

- The inspection then continued to the western side of the facility. The water sprayers to control dust from the coal piles were operating. Drainage was being collected in the facility ponds and ditches. However, the EPA ditch on the western side of the facility was blocked with coal due to equipment activity on the slopes of the coal. Bulldozers turning in one location of the storage area had created the blockage. The treatment system was then inspected. The treatment works appeared to be in good working order. The effluent appeared to be clear. One repair needed to be performed - a hose located in the treatment building was leaking and should be repaired or replaced.

Overall, the facility appeared to be in good working order with the exception of the broken pipe joint under the coal bridge which the facility reported to Mr. Skowronski later on September 8, 2008 to have been repaired and additional supports added to the piping to prevent future breakage. However, Ohio EPA continues to receive reports that the bridge is still leaking into the river and onto the ODNR facility and boats. The attached photos #4 and #5 show coal splatter on the ODNR boats which occurred on either September 5th or 6th. When asked on September 8th if the facility had sprayed the belt on either of those days, Mr. Jones indicated that they had not. If this is the case, then drainage must be occurring at other times than when the bridge is sprayed. Additional photos support this possibility. On September 10th and 15th, drainage was coming from the center of the bridge belt over the river (see photos #'s 6, 7, 8, and 9). This drainage also indicates that wastewater is leaving the bridge at other locations than the bridge hatch doors. Therefore, there is still a serious drainage problem from the bridge that must be addressed in the permit-to-install (PTI) to be submitted by the end of September. Also, on September 10th, information was received that the pipe was not connected under the bridge as indicated (see photo #10). Whatever work that was performed was not sufficient to keep the piping intact; therefore, additional work needs to be performed on the piping to prevent future breaks. Also, the residual coal noted

MR. PAUL ZOTTOLA, ENGINEER ENVIRONMENTAL OPERATIONS
NORFOLK SOUTHERN CORPORATION
SEPTEMBER 16, 2008
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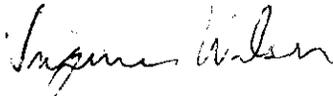
under the bridge on the ground approximately below where the pipe was broken should be removed. If coal is leaving the bridge, this too should be addressed in the PTI.

On September 8th, Mr. Bryant Johnson indicated that a special meeting would be scheduled at the facility so Ohio EPA could observe the bridge at the time when it is being sprayed. This meeting would be scheduled once the gaskets have been installed around the bridge hatch doors. I advised that this needs to happen as soon as possible because the findings during the bridge spraying may dictate what corrective measures will need to be constructed to prevent the illegal discharge to waters of the state and to the continued splattering of the ODNR equipment and buildings. The PTI to be submitted by October 1, 2008, should be complete and include all necessary measures. Also, either a new NPDES permit needs to be submitted to address the eastern side of the facility or a modification must be made to the current permit. This, too, should be submitted by October 1, 2008.

Please note that the above violations may be subject to an enforcement action and fines of up to \$10,000 per day per violation. Some of these violations, at a minimum, have dated back to June 9, 2008, and may extend beyond this date to an initial complaint of wastewater discharges to waters of the state.

If there are any questions or comments regarding this notification, please contact this me at (330) 963-1180.

Respectfully,

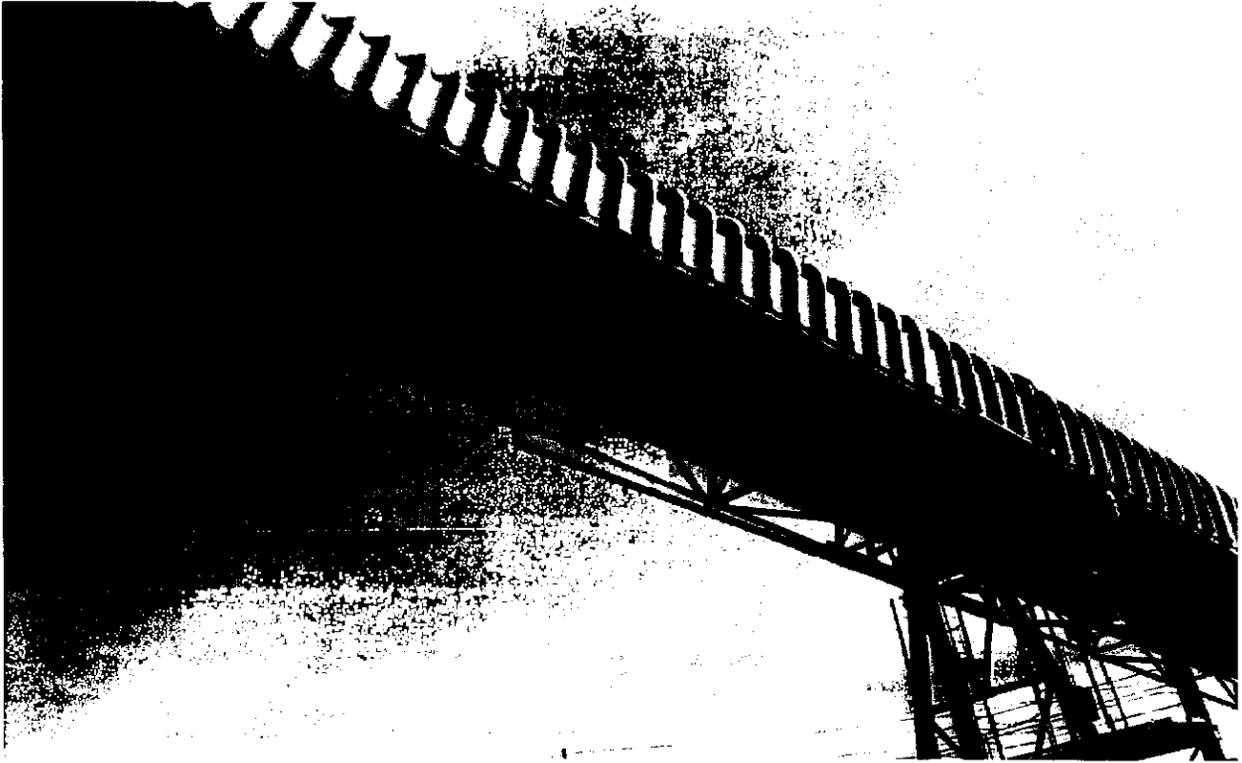


Virginia Wilson, P.E.
Geological Engineer
Division of Surface Water

VW/mh

cc: Bill Skowronski, District Chief, Ohio EPA, NEDO
Kevin Hauschildt, Senior Engineer, Norfolk Southern Railway Company

File: Industrial/Norfolk Southern/P&C



picture 1

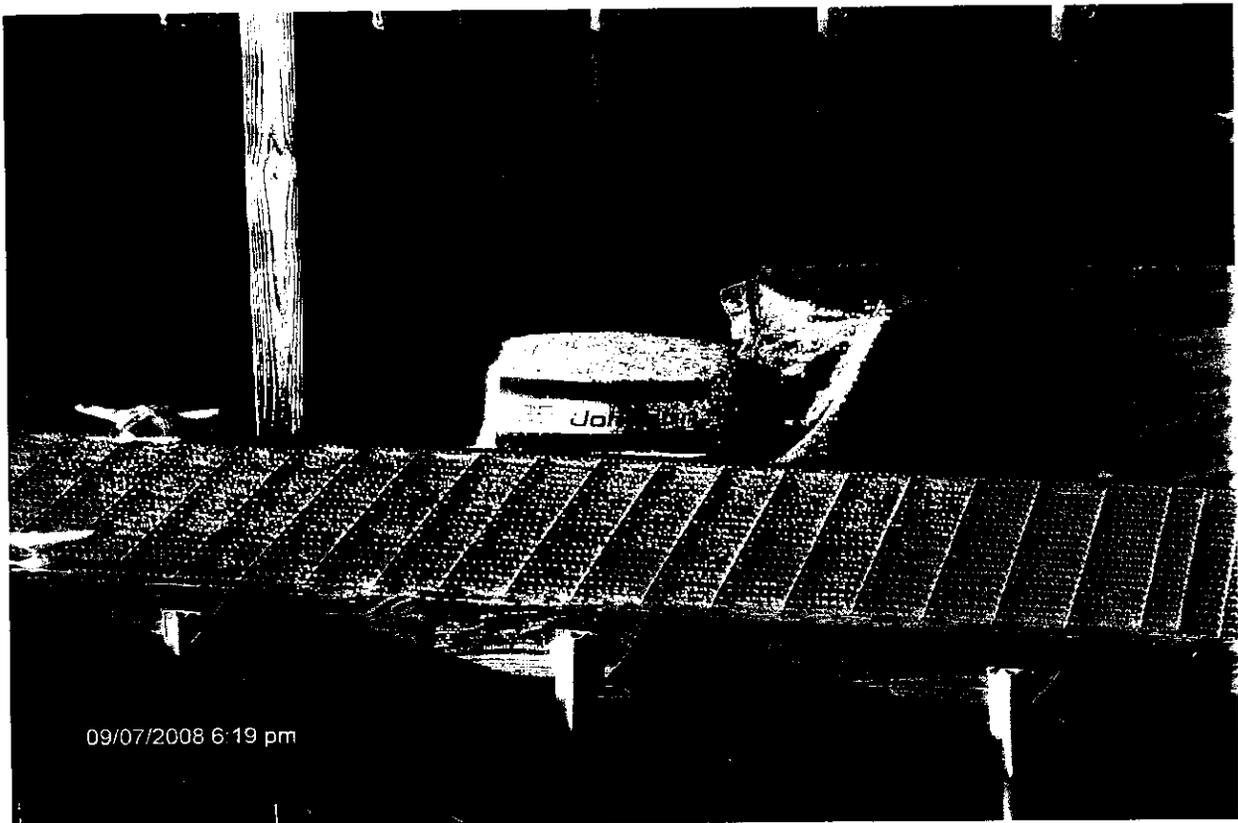
picture 2

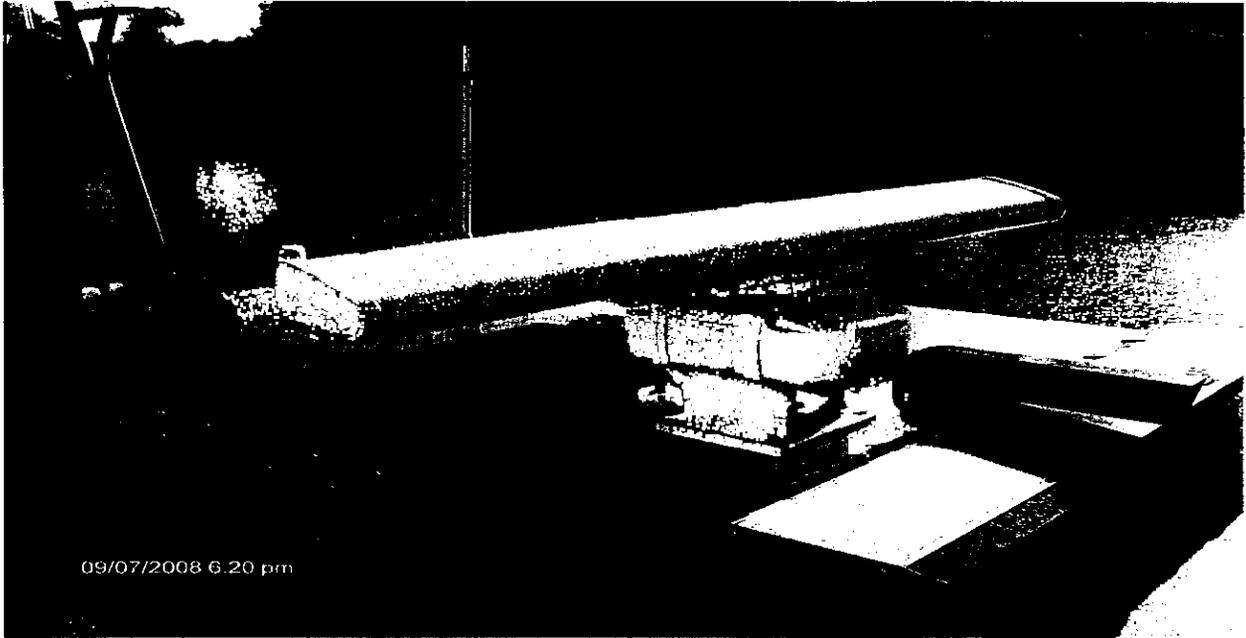




picture 3

picture 4

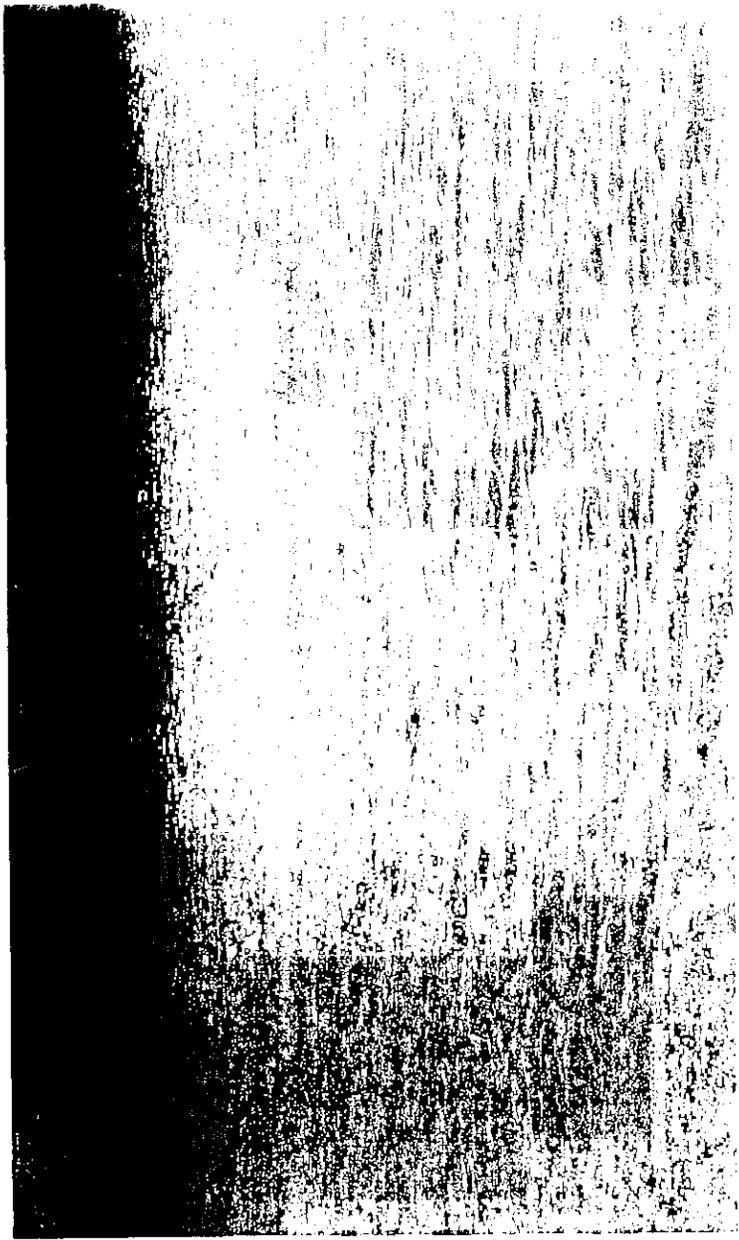




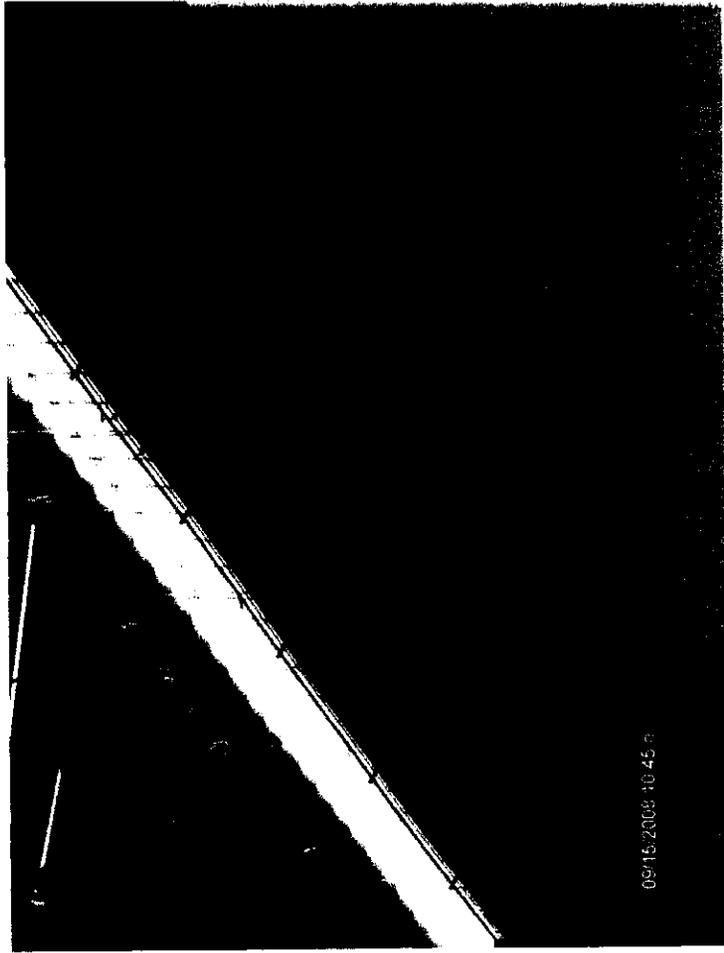
picture 5

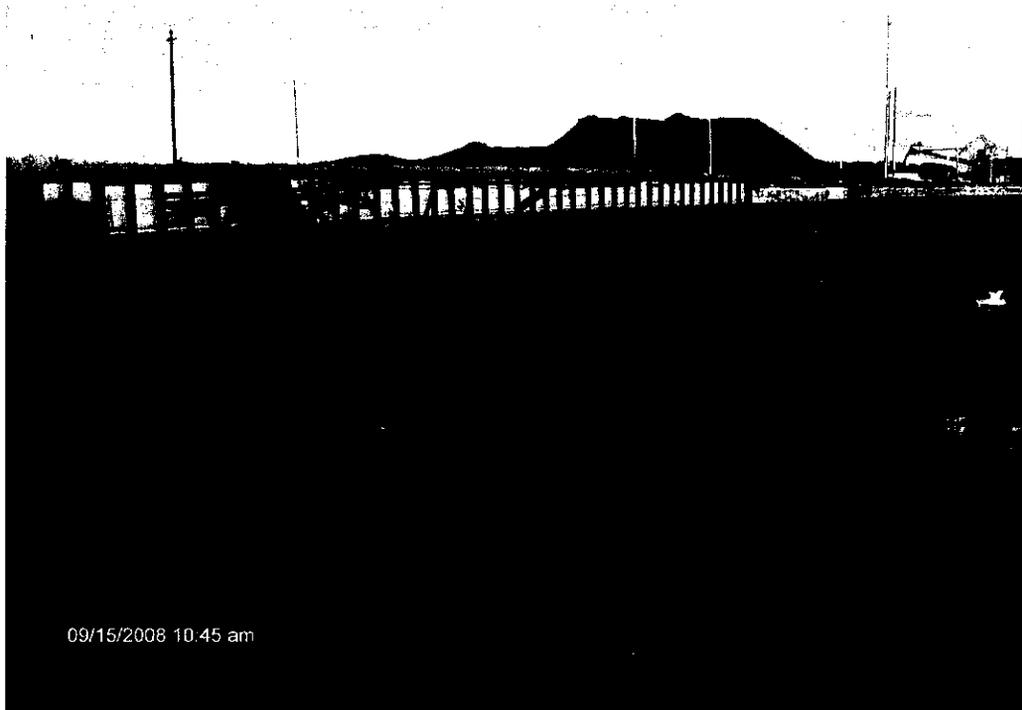


picture 6



picture 7





09/15/2008 10:45 am

picture 9

picture 10



09/10/2008 2:43 pm