



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Kerieski, Director

September 1, 2010

RE: PITTSBURGH AND CONNEAUT DOCK CO.
OHIO EPA PERMIT 3IN00000
CONNEAUT VILLAGE, ASHTABULA COUNTY
COMPLIANCE INSPECTION EVALUATION

Mr. William Kline, Maintenance Manager
Pittsburgh and Conneaut Dock Company
950 Ford Avenue
Conneaut, OH 44030

Dear Mr. Kline:

On August 31, 2010, a site inspection was conducted at the above referenced facility at 650 Ford Avenue, City of Conneaut, Ashtabula County. The inspection was conducted by John Schmidt of this office, with David Stanley and Robert Myers representing Pittsburgh and Conneaut Dock Company 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. The last compliance inspection was conducted on June 12, 2007.

Industrial process waste water is limited to storm water runoff collected from the 900 ac facility used to store incoming and outgoing materials, including coke, coal, gravel, and iron ore. Storm water is collected through a series of ditches and nine 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 Conneaut.

Storm water management includes water from building footer drains, runoff from paved areas of the facility, and various material stockpiles. Storm water is collected and discharged to ditches around the perimeter of the facility and is conveyed through one of nine pump stations throughout the facility through additional ditches and collected in a siltation pond. Storm water is collected in a 30 million gallon equalization basin. Influent flow and pH are monitored. Wastewater treatment includes neutralization with sodium hydroxide, polymer to aid in settling, and potassium to aid in iron removal. Components include a 500-gallon polymer tank, 6,500 caustic tank, with 13,000 gallon mix tanks for caustic, potassium, and polymer. Wastewater flows into a 274,000 gallon clarifier with skimmer. Sludge is removed from the clarifier weekly to a sludge pond. A final well is located at the clarifier discharge, where pH is monitored. Final discharge is to Conneaut Creek via Outfall 001. A second outfall, Outfall 002, discharged uncontaminated storm water runoff to Lake Erie. At the time of inspection, the wastewater system was not discharging due to lack of storm water flow.

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. Myers indicated that the equalization basin was dredged approximately 2 years prior to the August 31st inspection.
3. A log book of repairs and observations is maintained at the WWTP. Robert Myers performs routine operations at the WWTP, monitors the facility, and performs the sampling and submission of the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Most analytical work is sent to an outside laboratory.
4. The clarifier was observed in good working order, with a small amount of scum. The skimmer was observed in operational condition. Sludge is removed from the system as needed.
5. The sampler was not in use at the time of the inspection, as the plant was not operating. Mr. Myers noted that the sampler collects a 24-hour time-based composite sample.
6. The final discharge was not observed due to a lack of flow.

NPDES Permit Compliance Review

Pittsburgh and Conneaut Dock Company operates under Permit 3IN00000*GD A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2007 through August 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	20	24.9	2/13/2008
001	00530	Total Suspended Solids	1D Qty	75.7	80.7692	2/13/2008
001	01055	Manganese, Total (Mn)	30D Conc	500	535.25	2/1/2008
002	00400	pH	1D Conc	6.5	6.3	11/30/2007
001	01055	Manganese, Total (Mn)	1D Conc	1000	1040.	11/29/2007
001	01055	Manganese, Total (Mn)	30D Conc	500	658.	11/1/2007

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Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	01055	Manganese, Total (Mn)	30D Qty	1.9	2.07407	11/1/2007
001	00401	pH, Maximum	1D Conc	9.0	9.2	10/28/2007
001	01055	Manganese, Total (Mn)	30D Conc	500	602.2	1/1/2008
001	01055	Manganese, Total (Mn)	30D Qty	1.9	1.9573	1/1/2008
001	01045	Iron, Total (Fe)	1D Conc	1000	1460.	12/12/2007
001	01045	Iron, Total (Fe)	1D Conc	1000	1070.	12/26/2007
001	01045	Iron, Total (Fe)	1D Qty	3.79	4.66955	12/12/2007
001	01055	Manganese, Total (Mn)	1D Conc	1000	1240.	12/26/2007
001	01055	Manganese, Total (Mn)	30D Conc	500	740.5	12/1/2007
001	01055	Manganese, Total (Mn)	1D Qty	3.79	4.06448	12/26/2007
001	01055	Manganese, Total (Mn)	30D Qty	1.9	2.40166	12/1/2007
001	00530	Total Suspended Solids	1D Conc	20	46.2	5/12/2010
001	00530	Total Suspended Solids	30D Conc	15	17.7	5/1/2010
001	00530	Total Suspended Solids	1D Qty	75.7	140.767	5/12/2010
001	00401	pH, Maximum	1D Conc	9.0	9.1	12/5/2008
001	00530	Total Suspended Solids	1D Conc	20	23.	12/16/2009

A written explanation as to why these exceedence events occurred must be provided, along with measures to ensure that they are not repeated must be provided.

Reporting Violations

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

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids			AB	12/19/2007

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

If you feel some of Ohio EPA's reporting records are in error, you may wish to reenter this information through the eDMR system or mail your data to Ohio EPA DSW central office and request that the data be entered on your behalf. 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.

Compliance Schedule Violations

No compliance schedule violations were noted for the reporting period reviewed.

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Other Violations

Composite Sample Collection – 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.

Based on the above information, Pittsburgh and Conneaut Dock Company is considered to be in substantial compliance with the terms and conditions of the NPDES permit, however, the above items must be addressed.

Please inform this office, in writing, within 30 days of the date of this letter as to the actions we discussed that have been or will be taken to correct the above noncompliance or explanations if you believe the noncompliance issues noted are in error. 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/mt

File: Pittsburgh and Conneaut Dock Co. (Conneaut City) Ashtabula Co/Industrial P/C