



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

June 27, 2007

RE: ASHTABULA COUNTY
PITTSBURGH & CONNEAUT DOCK CO.
OHIO EPA PERMIT NO. 3IN00000
NPDES PERMIT NO. OH0000175

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

Dear Mr. Kline:

On June 12, 2007, a compliance inspection was conducted at the above referenced facility by the undersigned. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

Agency records indicate that the wastewater management system consists of a combination of conveyance ditches and pump stations that collect contaminated storm water runoff water associated with coal and iron ore storage and handling operations. The collected water is conveyed to the facility's treatment system prior to discharging to Conneaut Creek via Outfall 001. The treatment system relies on a combination of equalization, chemical neutralization, and sedimentation to treat the wastewater. A second outfall, 002, discharges uncontaminated storm water runoff to Lake Erie. At the time of the inspection, the facility was being cleaned and general maintenance was being performed.

A review of the self-monitoring reports received by Ohio EPA for the period July 2005 through June 2007 indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

Limit Violations

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
July 2005	001	Manganese, Total (Mn)	30D Conc	500	542.	7/1/2005
July 2005	001	Total Suspended Solids	30D Conc	15	147.	7/1/2005
July 2005	001	Total Suspended Solids	30D Qty	56.8	442.890	7/1/2005
July 2005	001	Total Suspended Solids	1D Conc	20	147.	7/27/2005
July 2005	001	Total Suspended Solids	1D Qty	75.7	442.890	7/27/2005
November 2005	001	Total Suspended Solids	30D Conc	15	37.	11/1/2005
November 2005	001	Total Suspended Solids	30D Qty	56.8	111.895	11/1/2005

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November 2005	001	pH, Minimum	1D Conc	6.5	4.2	11/22/2005
November 2005	001	pH, Minimum	1D Conc	6.5	4.2	11/23/2005
November 2005	001	pH, Minimum	1D Conc	6.5	6.3	11/29/2005
November 2005	001	Total Suspended Solids	1D Conc	20	37.	11/30/2005
November 2005	001	Total Suspended Solids	1D Qty	75.7	111.895	11/30/2005
January 2006	001	pH, Minimum	1D Conc	6.5	3.2	1/1/2006
January 2006	001	pH, Minimum	1D Conc	6.5	3.2	1/2/2006
January 2006	001	pH, Minimum	1D Conc	6.5	4.6	1/12/2006
July 2006	001	pH, Minimum	1D Conc	6.5	4.8	7/28/2006
August 2006	001	pH, Minimum	1D Conc	6.5	5.3	8/14/2006
September 2006	001	pH, Maximum	1D Conc	9.0	9.4	9/20/2006
September 2006	001	pH, Maximum	1D Conc	9.0	9.4	9/21/2006
September 2006	001	pH, Minimum	1D Conc	6.5	5.5	9/28/2006
September 2006	001	pH, Minimum	1D Conc	6.5	4.2	9/30/2006
October 2006	001	pH, Minimum	1D Conc	6.5	4.	10/1/2006
October 2006	001	pH, Minimum	1D Conc	6.5	5.8	10/4/2006
October 2006	001	pH, Minimum	1D Conc	6.5	6.2	10/5/2006
December 2006	001	Manganese, Total (Mn)	30D Conc	500	733.5	12/1/2006
December 2006	001	Manganese, Total (Mn)	30D Qty	1.9	2.07459	12/1/2006
December 2006	001	pH, Maximum	1D Conc	9.0	9.8	12/4/2006
December 2006	001	pH, Maximum	1D Conc	9.0	9.2	12/13/2006
December 2006	001	pH, Maximum	1D Conc	9.0	9.1	12/17/2006
December 2006	001	Manganese, Total (Mn)	1D Conc	1000	1100.	12/20/2006
January 2007	001	Manganese, Total (Mn)	30D Conc	500	644.4	1/1/2007
February 2007	001	Manganese, Total (Mn)	30D Conc	500	847.25	2/1/2007
February 2007	001	Manganese, Total (Mn)	30D Qty	1.9	2.34952	2/1/2007
March 2007	001	Manganese, Total (Mn)	30D Conc	500	616.5	3/1/2007
March 2007	001	pH, Maximum	1D Conc	9.0	9.4	3/26/2007
April 2007	001	Manganese, Total (Mn)	30D Conc	500	607.25	4/1/2007

Code Violations

Reporting Period	Station	Parameter	Reported Value	Violation Date
July 2005	001	Iron, Total (Fe)	AG	7/16/2005
August 2005	001	pH, Minimum	AG	8/17/2005
August 2005	001	Manganese, Total (Mn)	AG	8/31/2005
November 2005	001	Iron, Total (Fe)	AB	11/2/2005
November 2005	001	Manganese, Total (Mn)	AB	11/2/2005
November 2005	001	Total Suspended Solids	AB	11/2/2005
November 2005	001	Iron, Total (Fe)	AB	11/5/2005
November 2005	001	Manganese, Total (Mn)	AB	11/5/2005
November 2005	001	Total Suspended Solids	AB	11/5/2005
November 2005	001	Total Suspended Solids	AD	11/21/2005
March 2006	001	Iron, Total (Fe)	AG	3/11/2006
May 2006	001	Oil and Grease, Total	AG	5/3/2006
May 2006	001	Total Suspended Solids	AG	5/3/2006
February 2007	001	Flow Rate	AG	2/11/2007
April 2007	001	pH, Minimum	AG	4/20/2007

Frequency Violations

Reporting Period	Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
September 2005	9/1/2005	001	Copper, Total Recovera	1/Year	1	0
September 2005	9/1/2005	001	Nickel, Total Recovera	1/Year	1	0
October 2005	10/15/2005	001	Iron, Total (Fe)	1/Week	1	0
October 2005	10/15/2005	001	Manganese, Total (Mn)	1/Week	1	0
October 2005	10/22/2005	001	Iron, Total (Fe)	1/Week	1	0
October 2005	10/22/2005	001	Manganese, Total (Mn)	1/Week	1	0
October 2005	10/22/2005	001	Total Suspended Solids	1/Week	1	0
November 2005	11/8/2005	001	Iron, Total (Fe)	1/Week	1	0
November 2005	11/8/2005	001	Manganese, Total (Mn)	1/Week	1	0
November 2005	11/8/2005	001	Total Suspended Solids	1/Week	1	0
November 2005	11/22/2005	001	Iron, Total (Fe)	1/Week	1	0
November 2005	11/22/2005	001	Manganese, Total (Mn)	1/Week	1	0
November 2005	11/22/2005	001	Total Suspended Solids	1/Week	1	0
December 2005	12/1/2005	001	Oil and Grease, Total	1/Month	1	0
December 2005	12/8/2005	001	Iron, Total (Fe)	1/Week	1	0
December 2005	12/8/2005	001	Manganese, Total (Mn)	1/Week	1	0
December 2005	12/8/2005	001	Total Suspended Solids	1/Week	1	0
December 2005	12/15/2005	001	Iron, Total (Fe)	1/Week	1	0
December 2005	12/15/2005	001	Manganese, Total (Mn)	1/Week	1	0
December 2005	12/15/2005	001	Total Suspended Solids	1/Week	1	0
December 2005	12/22/2005	001	Iron, Total (Fe)	1/Week	1	0
December 2005	12/22/2005	001	Manganese, Total (Mn)	1/Week	1	0
December 2005	12/22/2005	001	Total Suspended Solids	1/Week	1	0
February 2006	2/1/2006	001	Iron, Total (Fe)	1/Week	1	0
February 2006	2/1/2006	001	Manganese, Total (Mn)	1/Week	1	0
February 2006	2/1/2006	001	Total Suspended Solids	1/Week	1	0
April 2006	4/1/2006	001	Iron, Total (Fe)	1/Week	1	0
April 2006	4/1/2006	001	Manganese, Total (Mn)	1/Week	1	0
April 2006	4/1/2006	001	Total Suspended Solids	1/Week	1	0
April 2006	4/8/2006	001	Iron, Total (Fe)	1/Week	1	0
April 2006	4/8/2006	001	Manganese, Total (Mn)	1/Week	1	0
April 2006	4/8/2006	001	Total Suspended Solids	1/Week	1	0
May 2006	5/1/2006	001	Oil and Grease, Hexane	1/Month	1	0
July 2006	7/1/2006	001	Oil and Grease, Hexane	1/Month	1	0
December 2006	12/1/2006	001	Oil and Grease, Hexane	1/Month	1	0
February 2007	2/1/2007	001	Oil and Grease, Hexane	1/Month	1	0
February 2007	2/15/2007	001	Total Suspended Solids	1/Week	1	0
April 2007	4/1/2007	001	Oil and Grease, Hexane	1/Month	1	0
May 2007	5/1/2007	001	Oil and Grease, Hexane	1/Month	1	0
May 2007	5/22/2007	001	Total Suspended Solids	1/Week	1	0

Also, the facility has not met its Total Manganese limit for 5 consecutive months.

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Based on the above information, P & C is considered to be in **significant noncompliance** with the terms and conditions of the NPDES permit and, therefore, subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Ohio EPA is aware that the facility recently submitted a permit-to-install to upgrade the storm water collection at the facility; however, this will not address all of the above violations, particularly the code and frequency violations. Therefore, please inform this office, in writing, as to the actions that have been or will be taken to correct the above violations. Your response should include the dates that the actions will be completed. Of significant importance is how the manganese issue will be addressed. Please be advised that past or present issues of noncompliance can continue as subjects of future enforcement actions by Ohio EPA.

If there are any questions or comments regarding this notification, please contact this office.

Respectfully,



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

VW/mt

File: Industrial/P&C Dock/PC