



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 10, 2008

RE: SUBTROPOLIS MINE
MAHONING COUNTY
PETERSBURG
NPDES PERMIT NO. 3IJ00063

Mr. Jeremy Mackall
Subtropolis Mine Company
5137 Garfield Road
Petersburg, OH 44454

Dear Mr. Mackall:

On October 21, 2008, this writer conducted a Compliance Evaluation Inspection (CEI) at the Subtropolis Mine on Garfield Road in Springfield Township. The intent of the inspection was to evaluate the site for compliance with the NPDES Permit and to verify information provided in the NPDES Permit application for renewal of the permit.

Observations

Following are observations made during the inspection.

- Sediment was being removed from Pond 001. It was understood that the sediment removed from the pond is disposed in the underground mine. You indicated that an access drive may be constructed into the pond to make sediment removal easier in the future. The drive may also prevent storm water from short circuiting the pond.
- Three internal sludge lagoons still discharge to Pond 001. However, a new silt trap has recently been constructed between the lagoons and the pond. The new silt trap receives the overflow of storm water from the sludge lagoons prior to discharging into Pond 001. The new silt trap should reduce the cleaning frequency of Pond 001.
- Two areas need to be reseeded in the spring. The first area is along the dike on the south side of the property and adjacent to the lake. One large section of the dike remains bare of vegetation. The second area is behind the surge stacker located on the east side of the property. Both areas must be reseeded and mulched to establish the necessary vegetation to prevent sediment runoff. The area on the dike may need to be secured with a mat to prevent storm water runoff from eroding the seed from the site.
- Pond 004 is located at the safety tunnel exit. You indicated that the pond had not been checked for several years. Samples of any discharge had also not been collected for analysis and reporting. As discussed, you must begin checking the pond during and after rain events. If discharging, you must collect samples for analysis and report results to this Agency in accordance with the NPDES Permit.
- A new silt trap has been constructed adjacent to the outlet from Pond 002. The silt trap collects water pumped from the deep mine. As discussed, Outfall 002 will be relocated and renumbered to include the outfall from Pond 002 and from the new silt trap.

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- You indicated that Pond 002 was recently cleaned in September and October 2008.
- Pond 003 had not been constructed at the time of the inspection. You indicated that you wanted to retain the outfall in the permit in the event construction of the pond is necessary in the future.

Compliance Review

A review of the Monthly Operating Reports for the Subtropolis mine was conducted for the time period covering April 2007 through July 2008. Following are permit violations documented during the review period.

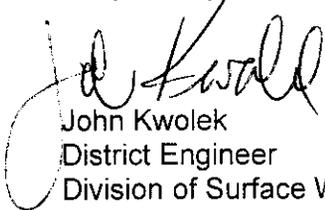
Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	Total Suspended Solids	1D Conc.	45	46.	5/5/2008
001	Total Suspended Solids	1D Conc.	45	126.	5/9/2008
001	Total Suspended Solids	30D Conc.	30	54.	5/1/2008
001	Total Suspended Solids	1D Conc.	45	47.	1/3/2008

Be advised that violations of the NPDES Permit are subject to enforcement action in accordance with Ohio Revised Code 6111.09

Finally, as discussed during the inspection, the new NPDES Permit will require the development of a Storm Water Pollution Prevention Plan. The intent of the plan will be to review the entire site to demonstrate the drainage areas associated with the site, identify areas of potential sediment runoff, propose any actions necessary to control sediment runoff where necessary, and propose a schedule and checklist for the periodic inspection of sediment control facilities. The plan must be stamped by a Professional Engineer registered in the state of Ohio.

If you have any questions regarding proper reporting, you may contact this writer at (330) 963-1251 to discuss your questions.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Richard McPherson

File: Industrial/Subtropolis Mine/Permits and Compliance