



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

October 2, 2007

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

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

Dear Mr. Mackall:

Enclosed is a revised inspection letter from the June 28, 2007 inspection of the Subtropolis Mine. The date of inspection was incorrect in the original letter.

Respectfully,

John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Tater, East Fairfield Coal

File: Industrial/Subtropolis Mine/Permits and Compliance



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RE: SUBTROPOLIS MINE
MAHONING COUNTY
PETERSBURG
NPDES PERMIT NO. 31J00063

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

Dear Mr. Mackall:

On June 28, 2007, 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 National Pollutant Discharge Elimination System (NPDES) permit and to conduct a compliance evaluation of the site relative to the NPDES permit. Tater represented the company during the inspection.

Observations

It appeared that all mining processes were operational at the time of the inspection. Two points of possible wastewater discharge were identified from Pond 1 and Pond 2. Both ponds discharge to an unnamed tributary of the North Fork Little Beaver Creek. Pond 01 discharges to an unnamed tributary on the southeast corner of the property and Pond 02 discharges on the north side of the property.

The water that accumulates in Pond 02 is used as make-up water for the limestone washing facility. The water from the limestone washing facility is discharged to one of three sumps on the southeast corner of the property. The sumps are used to settle fines prior to discharging the water to Pond 01.

A new pond will be constructed on the west side of the entrance road and will discharge to Pond 02. The new pond will receive storm water runoff from the screening and separation areas of the property. Sediment will be settled from the runoff prior to discharging into Pond 02. Pond 02 was found to have a significant sediment build-up at the outfall. It was the understanding of this writer that the source of the sediment was from the runoff water that will eventually pass through the new pond. It is recommended that the new pond be constructed as soon as possible and that sediment in Pond 02 be removed as soon as possible. The proximity of the sediment in Pond 02 relative to the outlet could cause the sediment to be discharged to the unnamed tributary and eventually the North Fork Little Beaver Creek in the event Pond 02 discharges due to a large rain event.

The discharge from Pond 01 appeared slightly cloudy. Tater indicated that to address the cause of the cloudiness, outlets covered with a filter material would be placed in each of the three sumps receiving wash water. The filter material is intended to remove fines from the wastewater prior to entering Pond 01. It was also the understanding of this writer that the outlet for the new pond to be constructed along the entrance road will also be constructed with a similar outlet design. It is recommended that the sumps be retrofitted with the outlet structures and filter material as soon as possible to prevent the cloudy appearance of wastewater discharged from Pond 01.

Mr. Tom Mackall
Subtropolis Mine Company
October 2, 2007
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Compliance Review

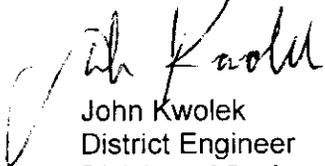
A review of the Monthly Operating Reports for the Subtropolis Mine was conducted for the time period covering August 2006 through May 2007. For all eight permitted outfalls identified in the NPDES permit, Subtropolis reported no discharge throughout the review period. Be advised that in the event there is a discharge from any of the outfalls during the month, samples must be collected and analyzed for pH, and Total Suspended Solids each week there is a discharge. Total precipitation and discharge flow must be reported each day there is a precipitation event and discharge event. Samples must be collected and analyzed once per quarter. All parameters identified in the NPDES permit must be reported each month on the Monthly Operating Reports (MORs) in accordance with the frequency identified in the permit.

The code "AL" used by Subtropolis for the MORs can be used only in the event there is no discharge and no precipitation for the entire month. In the event there is no discharge and one or more precipitation events, Subtropolis must accurately report the precipitation events but use the code "AH" each day of the month for flow rate and at the frequency identified in the NPDES permit for the other regulated parameters. For pH and TSS, the correct frequency for reporting "AH" is once per week when there are precipitation events but no discharge events for the entire month. In the event there is one or more discharge events for a particular month, Subtropolis is required to report the flow during the day(s) of discharge and collect samples for the regulated parameters at the permitted frequency.

Be advised that failure to report as required by the NPDES permit constitutes a violation of Ohio Revised Code 6111.07 and is subject to enforcement action including fines of up to \$10,000.00 per violation.

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: Tater, East Fairfield Coal
Gary Schaefer, Geologist/Permitting, Subtropolis Mining Co.

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