

**Environmental
Protection Agency**

Governor
Lt. Governor
Director

October 19, 2011

RE: MAHONING COUNTY
EAST FAIRFIELD COAL COMPANY
PETERSBURG LIMESTONE MINE
NPDES PERMIT NO. 31J00059

Mr. Tom Mackall
East Fairfield Coal Company
P.O. Box 217
North Lima, OH 44452

Mr. Mackall:

On September 21, 2011, this writer conducted an unannounced Compliance Evaluation Inspection (CEI) at the East Fairfield Coal Co. limestone mine in Petersburg, OH. The site is located at 13699 Youngstown-Pittsburgh Road (S.R. 170). The intent of the inspection was to evaluate operations and maintenance of the storm water management system for the site. No precipitation event was occurring at the time of the inspection.

Observations

Following are observations at the time of the inspection:

1. The wash plant was operating at the time of the inspection. Wash water from Basin No. 3 was discharging to Basin No. 2 at the time of the inspection.
2. No discharge from the dredge pit to Basin No. 2 was occurring at the time of the inspection. The dredge pit contained a substantial amount of solids
3. The old wash plant area drains to an intermediate basin which then drains into Basin No.1. The intermediate basin is located north of Basin No. 1. A significant amount of erosion in the drainage way to the intermediate basin was observed during the inspection. This problem of erosion in the drainage way is identified each inspection. Erosion in the ditches is not typical of a well-designed storm water drainage ways and unnecessarily adds to the sediment load on the settling basins. The negative impacts to the company are an increased frequency of basin cleaning and the associated increased costs.

The East Fairfield Coal Company needs to evaluate the drainage way and stabilize the ditch to prevent heavy erosion. The banks of the intermediate pit

were also heavily eroded at the point of entry for the drainage way. The drainage way and the inlet to the intermediate basin should be repaired and hard armored to prevent erosion.

It appears that the velocity of flow through the drainage way generates too much energy in the system. This excess energy is the cause of the erosion identified during each inspection. It is recommended that East Fairfield Coal evaluate the drainage way and take steps necessary to reduce the velocity of flow. Steps such as enlarging the drainage way to increase the flow area through the ditch, along with hard armoring, will help to reduce erosion. Controlling erosion in the drainage way preserves the integrity of the intermediate basin and reduces the sediment load to Basin No. 1.

4. It appeared that the outlet structure from the intermediate basin was significantly eroded. The eroded outlet appears to have reduced the volume of the intermediate basin resulting in a reduction in the retention time. The outlet structure of the intermediate basin must be evaluated, and any repairs to the outlet structure need to be made no later than November 30, 2011. The size of the outlet structure needs to be evaluated to ensure that the velocity of flow through the system is not excessive and causing erosion.
5. Basin No. 1 appeared to require cleaning. Significant sediment deposition was observed at the inlet to the basin. Sediment deposition in the basin has reduced the effective volume of the basin and the retention time. Though no discharge from the basin was observed during the inspection, the contents of the basin were turbid. This turbidity could carry over to the Honey Creek basin during the next discharge event.

It appears that Basin No. 1 should be dredged as soon as possible to restore the original volume of the basin. The dredged material must be disposed in a secure area where runoff of sediment to waters of the state is not possible. The basin should be dredged no later than November 30, 2011.

6. The contents of Basin No. 2 adjacent to the hall road were free of any significant turbidity. Consequently, the water being discharged from Basin No. 2 at the time of the inspection also appeared low in turbidity. No concerns regarding Basin No. 2 were identified.
7. Basin No. 4 was inspected. No concerns regarding Basin No. 4 were identified.

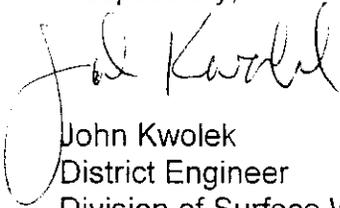
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Compliance Review

The Monthly Operating Reports for the Petersburg mine were reviewed for violations of the National Pollutant Discharge Elimination System (NPDES) Permit. The period of review was September 2010 through August 2011. No violations of the NPDES Permit were identified.

In the event you have any questions regarding this inspection letter, you may contact this office at (330) 963-1251 or at john.kwolek@epa.state.oh.us.

Respectfully,

A handwritten signature in black ink, appearing to read "John Kwolek". The signature is written in a cursive style with a large initial "J".

John Kwolek
District Engineer
Division of Surface Water

JK/cs

cc Mike Holisky, East Fairfield Coal