



**Environmental  
Protection Agency**

**John R. Kasich, Governor**

**Mary Taylor, Lt. Governor**

**Scott J. Nally, Director**

July 10, 2012

RE: NORFOLK SOUTHERN CORPORATION  
ASHTABULA COAL DOCK  
OHIO EPA PERMIT 3IT00011  
ASHTABULA CITY, ASHTABULA COUNTY  
COMPLIANCE EVALUATION INSPECTION

Mr. C. Russell McDaniel, P.E.  
Director of Environmental Engineering, Remediation and Compliance  
Norfolk Southern Corporation  
1200 Peachtree Street NE, Box 13  
Atlanta, GA 30309

Dear Mr. McDaniel:

On October 20, 2011, a compliance evaluation inspection was conducted at the above referenced facility at 645 East 6<sup>th</sup> Street (north end of Ferry Drive), City of Ashtabula, Ashtabula County. Virginia Wilson, John Schmidt, and Laura Barrett represented Ohio EPA during the inspection. John Gegan, Lynn Winchester, and Paul Zottola represented Norfolk Southern Corp. (NS) 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 and in conjunction with renewal of this NPDES permit. The last compliance inspection was conducted on October 20, 2011.

Industrial process wastewater is limited to dust suppression runoff water and storm water runoff collected from the facility used to store incoming and outgoing coal. Coal arrives at the eastside of the facility and is rotary dumped from the rail cars and placed onto a belt conveyor and is transferred to the west side for storage. Storm water is collected through a series of ditches and 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 Ashtabula.

Storm water management includes water from dust suppressant activities, bridge washing activities, building footer drains, paved areas, and various coal stockpiles. (Some roof drains are routed directly to Lake Erie and are not intercepted by the storm water collection and treatment system.) Collected storm water is routed to a preliminary treatment siltation pond. Water is also collected from the eastern half of the coal conveyor into a retention tank which is trucked to the preliminary siltation pond. Water flows from the siltation pond to a one million gallon equalization basin. Influent flow and pH are monitored. Wastewater treatment includes neutralization with potash in the equalization basin and with caustic soda (20% solution) in a clarifier and two sand filter towers with flow metering and pH metering prior to discharge. Additional components include a caustic tank and two empty auxiliary tanks. Sludge is removed from the clarifier on a weekly basis and placed in covered sludge drying beds. Dried sludge is removed to a landfill. Final discharge is to a wetland area and Lake Erie via Outfall 001.

**Observations and Notations**

The following observations and notations were made during the inspection:

1. The plant operates in batches as needed. During the inspection, the plant was not operating. Due to the lack of rainfall this summer, the plant is operating as-needed and operates only a few times a month. 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. Jones indicated that the equalization basin and siltation basin are dredged as needed.
3. A log book of repairs and observations is maintained at the wastewater treatment plant (WWTP). Drew Teeter performs routine operations at the WWTP, monitors the facility, and collects samples. Most analytical work is performed by EA Group.
4. The clarifier was observed in good working order. Sludge is removed from the system routinely.
5. Sludge was removed from two of the three sludge drying units between May 15, 2012 and June 15, 2012. Waste was hauled by American Waste Services to Allied Waste's Carbon Limestone Landfill.
6. The flow-proportional sampler was not in use at the time of the inspection.
7. The final discharge was not observed due to a lack of flow.
8. The conveyor bridge was not being washed during the inspection.

**NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period September 1, 2011 through June 1, 2011 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below:

**Effluent Violations**

No effluent violations were noted for the reporting period reviewed.

**Frequency Violations**

Ohio EPA notes that we have not received the submission of the May 2012 eDMR report. Per Part III, Item 4C of your permit, NS is required to submit the eDMR for any given month no later than the 20<sup>th</sup> day of the month following the month of interest (i.e. the May 2012 eDMR was due no later than June 20, 2012). Please submit the May 2012 eDMR as soon as possible. NS is reminded that the June 2012 eDMR must be submitted no later than July 20, 2012.

Compliance Schedule Violations

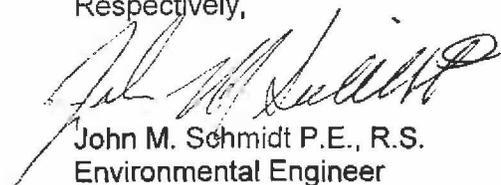
Regarding your compliance schedule, Ohio EPA notes the following:

Permit Effective Date	Permit Expiration Date	Schedule Due Date	Completion Date	Event Code	Schedule Type	Schedule Milestone
4/01/2005	3/31/2010	5/01/2005	4/30/2005	---	Construction	Evaluate WWTP and SWPPP
4/01/2005	3/31/2010	7/01/2005	1/24/2011	---	Construction	Submit Engineering Report
4/01/2005	3/31/2010	7/01/2006	Ongoing	---	Construction	Implement Recommendations
4/01/2005	3/31/2010	7/01/2005	7/1/2005	---	Construction	Install Composite Sampler

No additional information is needed at this time to respond to the compliance schedule violations.

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/cs

cc: Paul Zottola, Norfolk Southern  
Lynn Winchester, Norfolk Southern  
Martha Horvitz, Ohio EPA Legal, CO

File: Industrial/Norfolk Southern Railway (Ashtabula)/PC