



**Environmental  
Protection Agency**

**John R. Kasich, Governor**

**Mary Taylor, Lt. Governor**

**Scott J. Nally, Director**

October 23, 2012

RE: PITTSBURGH AND CONNEAUT DOCK CO.  
OHIO EPA PERMIT 3IN00000  
CONNEAUT VILLAGE, ASHTABULA COUNTY  
COMPLIANCE INSPECTION EVALUATION

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

Dear Mr. Kline:

On October 22, 2012, a site inspection was conducted at the above referenced facility at 650 Ford Avenue, City of Conneaut, Ashtabula County. The inspection was conducted by John Schmidt of this office, with Lou Weichselder representing Canadian National Railways - Pittsburgh and Conneaut Dock Company (PCDC) 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. The last compliance inspection was conducted on September 21, 2012.

Industrial process waste water is limited to storm water runoff collected from the 900 ac facility used to store incoming and outgoing materials, including coke, coal, gravel, and iron ore. Storm water is collected through a series of ditches and nine 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 Conneaut.

Storm water management includes water from building footer drains, runoff from paved areas of the facility, and various material stockpiles. Storm water is collected and discharged to ditches around the perimeter of the facility and is conveyed through one of nine alarm-equipped pump stations throughout the facility through additional ditches and collected in a siltation pond. Storm water is collected in a 30 million gallon equalization basin. Influent flow and pH are monitored. Wastewater treatment includes neutralization with sodium hydroxide, polymer to aid in settling, and potassium to aid in iron removal. Components include a 500-gallon polymer tank, a 6,500 caustic tank, with a 13,000-gallon mix tank for caustic, potassium, and polymer. Wastewater flows into a 274,000-gallon clarifier with skimmer. Sludge is removed from the clarifier weekly to a sludge pond. A final well is located at the clarifier discharge, where pH is monitored. Final discharge is to Conneaut Creek via Outfall 001. A second outfall, Outfall 002, discharged uncontaminated storm water runoff to Lake Erie.

**Observations**

The following observations were made during the inspection:

1. The system is designed to intercept any storm water runoff from material handling and storage areas. No change in material handling practices or locations was noted over the last inspection.

2. The plant was found in overall satisfactory condition. Plant equipment was found reasonably clean and operational. The plant was currently operating at about 640 gpm. Mr. Weichselderfer indicated that the equalization basin was dredged approximately four years prior to the October 22, 2012 inspection.
3. A log book of repairs and observations is maintained at the WWTP. Jerry Fertig and/or Dave Fausnaught perform routine operations at the WWTP, monitor the facility, and perform the sampling at the facility. Louis Weichselderfer submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Most analytical work is sent to an outside laboratory.
4. The clarifier was observed in good working order. The skimmer was observed in operational condition. Sludge is removed from the system as needed.
5. The sampler was not in use at the time of the inspection, as was maintained at the proper temperature. The sampler has been upgraded from a 24-hour time-based composite sampler to a flow proportional sampler per the 2010 inspection. pH meters and flow meter were calibrated on June 11, 2012.
6. The storm water pollution prevention plan (SWPPP) dated November 8, 2006 was last updated on January 25, 2012. The annual site certification was completed on October 22, 2012, and the inspection completed on January 25, 2012. Employee training on the plan occurred on October 26-27, 2011.

#### **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, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit as identified below.

#### **Effluent Violations**

The following effluent violations were noted for the reporting period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	15	17.25	12/1/2011
001	00530	Total Suspended Solids	1D Conc	20	53.	12/7/2011
001	00530	Total Suspended Solids	1D Qty	75.7	166.702	12/7/2011

PCDC provided an explanation, along with measures to ensure that it is not repeated, on January 19, 2012. No additional information is needed to respond to the violation.

#### **Reporting Frequency and Code Violations**

No reporting code or frequency violations were noted for the time period reviewed.

#### **Compliance Schedule Violations**

No compliance schedule violations were noted for the reporting period reviewed. The current permit does not contain a compliance schedule.

Mr. William Kline, Maintenance Supervisor  
Pittsburgh and Conneaut Dock Co. WWTP  
October 23, 2012  
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If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,

A handwritten signature in cursive script, appearing to read "John M. Schmidt".

John M. Schmidt P.E., R.S.  
Environmental Engineer  
Division of Surface Water

JMS/cs

File: Industrial/Pittsburgh and Conneaut Dock Co. P/C