



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

July 25, 2013

Mr. J.B. Roberts
Regional Manager of Environmental Field Services
Northern Region
CSX Transportation, Inc.
1717 Dixie Highway, Suite 400
Ft. Wright, Kentucky 41011

**RE: CSX Transportation, Inc., Queensgate Yard – Cincinnati, Ohio
NPDES Permit # 1GR00529*EG, Industrial Storm Water Site Inspection**

Dear Mr. Roberts:

On Friday, July 19, 2013, I inspected the CSX Transportation's Queensgate Yard facility at 3601 Geringer Avenue, Cincinnati, Ohio to assess the facility's compliance with the Industrial Storm Water Discharge Permit that was issued to CSX Transportation, Inc. on March 5, 2012 (1GR00529*EG). You and Kevin Placke represented CSX Transportation, Inc. during the inspection.

Based on my observations of the site's operations, it appears the facility is in compliance with the terms of its Industrial Storm Water Discharge Permit. A copy of my inspection report is enclosed.

If you have any questions related to this inspection, I can be reached at (937) 285 - 6098, or via email at Ron.Ware@epa.ohio.gov.

Sincerely,

Ron Ware
Environmental Specialist
Division of Surface Water

Enclosure

RWbp

Industrial Storm Water Compliance Enforcement Inspection;

Name of facility; CSX Transportation, Inc. DBA Queensgate Yard

Address; 3601 Geringer Ave
Cincinnati, Ohio 45223

Permit number; 1GR00529 **Applicable permit sector;** P

Date of visit: July 19, 2013 **Time started:** 9:05 AM **Time ended:** 11:25 AM

Facility representative(s): Mr. J.B. Roberts, (502) 418-2370

Regional Manager of Environmental Field Services

Mr. Kevin Placke, Treatment Plant Operator (513) 369-5108

OEPA inspector; Ron Ware

SWP3;

A. Did the facility representative(s) produce an SWP3? Y

A copy of the "Multi-Sector" General Permit for Storm Water Associated with Industrial Activity (Ohio EPA General Permit # 1HR000005) is included in the Storm Water Pollution Prevention Plan (SWP3), as well as assessments and descriptions of Sector P specific Potential Pollutant Sources that could contribute pollutants to storm water discharges.

The SWP3 also includes a copy of the facility's industrial user discharge permit from the Metropolitan Sewer District of Greater Cincinnati (SIU - 280). This permit covers the discharge from the facility's on-site storm water pretreatment system. The on-site pretreatment system consists of three collection tanks, a series of chemical addition and mixing tanks, a DAF (Diffused Air Flootation) tank, and a flow metering tank. There are two drying beds for the sludge generated by this treatment system.

The on-site pretreatment system treats collected storm runoff from the areas of the railroad yard where locomotives and freight cars are parked, maintained, and cleaned, as well as the areas where locomotives are fueled and loaded with traction sand. It also treats any maintenance related wastewater generated in the locomotive and freight car maintenance buildings. The "blow down" water from some of the air compressors in the yard is also collected and treated by this on-site treatment system. The remaining air compressors in the yard have their own collection tanks for "blow down" water, which are serviced by an outside service company.

A1. Did the SWP3 include a site map? Y

In regards to the Sector P portion of the facility, the SWP3 Drainage Area Site Map identified the following areas of the facility and indicated whether activities occurring there may be exposed to precipitation and/or surface runoff:

- Locomotive fueling areas
- Locomotive and freight car parking areas
- Locomotive and freight car maintenance areas
- Locomotive cleaning areas
- Loading/unloading areas
- Areas where treatment, storage and/or disposal of wastes occur
- Liquid storage tanks and material storage areas.

A2. Did it include schedules and procedures for the Routine Facility Inspections (RFI)? Y

The RFI's are performed on a monthly basis. If repairs and/or replacements of BMP control measures are needed, the SWP3 does indicate that the facility would plan for and make repairs or replacements as needed. Spill Prevention and Response procedures are noted in the SWP3. Employees are instructed to call the 1 - 800 number to CSX Transportation's Public Safety Coordination Center for spills or any other type of emergency. Weather conditions at the time of the RFI's are noted.

A3. Did the SWP3 include schedules and procedures for the comprehensive annual facility inspection? Y

A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? Y

The SWP3 indicates that the information gathered for the quarterly visual assessment includes the following: sample location; sample collection date/time; visual assessment of the samples (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other indicator of polluted storm water); name and signature of person conducting the visual assessment; nature of the discharge (i.e., runoff or snowmelt); likely sources of any observed contamination; and an indication that the sample was collected within the 1st 30 minutes of the rain event and at least 72 hours from the last storm event. The following visual inspection areas specific to Sector P are included:

- Locomotive fueling areas
- Locomotive and freight car parking areas
- Locomotive and freight car maintenance areas
- Locomotive cleaning areas
- Loading/unloading areas
- Areas where treatment, storage and/or disposal of wastes occur
- Liquid storage tanks and material storage areas.

A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? N/A

Comments; "Sector P" facilities (Land Transportation and Warehousing - SIC 4213) do not have required benchmarks.

Inspection records:

A. Were inspection records available? Yes

Site Observations:

B. Are materials stored exposed to weather? Yes.

Spare parts for locomotives and freight cars, and rail ties are stored on the yard site. These areas are inspected during the Routine Facility Inspections.

C. Are there any structural storm water management practices used onsite? Examples include grassy swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens.

Yes. In addition to the aforementioned on-site pretreatment system, the facility has spill cleanup kits at numerous locations around the yard. "Track pads" are placed in those areas where locomotives are parked.

D. Number of outfalls from site/number inspected: 02/02

E. Did any show evidence of pollutants discharged in the storm water? No

F. Other observations/comments:

Used aerosol paint cans, oil containers, and other fluid containers are punctured and thoroughly drained into drums before being disposed of.