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

August 26, 2013

Re: Harrison County
Hopedale Mining, LLC
(Hopedale Mining and Prep Plant)
Compliance Evaluation Inspection
NPDES Permit 0IL00093*HD

Mr. Burt Garofalo, Senior Mining Engineer
Hopedale Mining, LLC
P.O. Box 415
86900 Sinfield Road
Hopedale, Ohio 43976

Dear Mr. Garofalo:

On August 6, 2013, I conducted a Compliance Evaluation Inspection at the Hopedale Mining facility, located at 86390 Sinfield Road, Hopedale, Ohio. You and Bob Henderson, Prep Plant Superintendent, represented Hopedale Mining during the inspection.

The purpose of the inspection was to determine Hopedale Mining's compliance with NPDES Permit Number 0IL00093*HD and the Ohio Water Pollution Control Act, Revised Code Chapter 6111, and to obtain updated information to be used in renewing the permit.

As a result of the inspection and review of our files, I have the following comments:

1. The sewage treatment facility serving the prep plant was rehabilitated since the previous inspection. (Outfall 010). The plant has not performed well since it was restarted. At the time of the inspection, the mixed liquor in the aeration tank appeared thin, and the sludge return and skimmer lines were pumping continuously. The effluent was grey and turbid. It is recommended that staff responsible for the two STPs on site attend training on operation of extended aeration sewage plants. Until training can be scheduled, staff may find it helpful to locate and review available reference manuals on extended aeration. The plant will most likely require some adjustments to achieve optimum performance.

2. The treatment system for the site stormwater and coal refuse disposal drainage was performing well at the time of the inspection. The facility has changed from using only sodium hydroxide to a proprietary solution containing sodium

3. permanganate and sodium hydroxide for oxidation and neutralization. Continuous pH monitoring is performed on the effluent. The final effluent at 009 was clear.

4. A review of the Discharge Monitoring Reports for the facility for the period of October 2012 through August 2013, showed the following limitation violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
010	00530	Total Suspended Solids	1D Conc	18	22.	12/5/2012
010	00530	Total Suspended Solids	30D Qty	0.07	.09811	6/1/2013
010	80082	CBOD 5 day	30DConc	10	13.2	6/1/2013
010	80082	CBOD 5 day	1D Qty	0.086	.10792	6/11/2013
010	80082	CBOD 5 day	30D Qty	0.06	.10792	6/1/2013

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111.

Also, you are reminded that you are required to report any non-compliance that is the result of any violation of a daily maximum discharge limit or due to an upset or unanticipated bypass that results in an exceedance of any effluent limitation within 24 hours of discovery by email or telephone, with a written follow-up notice within 5 days. Please refer to Part IIII, Paragraph 12 of the NPDES permit for specific notification requirements.

5. The facility's NPDES permit expired on May 31, 2011. Hopedale Mining's renewal application was received on December 2, 2010. Ohio EPA expects to renew the permit this year. We discussed some of the requirements anticipated in the renewed permit, including outfall signs, sewage plant operator certification, sewage plant operating logs, and development of a storm water pollution prevention plan.

6. Records on disposal of sludge from the sewage plants were not available at the time of the inspection. Please forward copies of sludge disposal manifests and/or invoices for sludge disposed during the previous year. Please maintain records on all sludge disposal to enable verification that the sludge was delivered to appropriate receiving facilities.

Overall, the facility appeared to be in substantial compliance with the NPDES permit on the day of the inspection.

Attached is a copy of the inspection report which indicates a marginal evaluation of the following area: Operations and Maintenance. I gave this rating because of the performance of the outfall 010 sewage treatment system. Hopedale Mining, LLC, should take the appropriate actions to return the facility to compliance with all terms and conditions of the NPDES permit.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at (614) 644-3469 or me for additional information.

Please respond to this letter in writing within 30 days. You may contact me with any questions.

Sincerely,

Fred J Snell

Fred J. Snell
District Representative
Division of Surface Water

FJS/dh

Enclosure

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
0IL00093*HD	OH0011827	August 6, 2013	C	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Hopedale Mining LLC 86900 Sinfield Road Hopedale, Ohio 43976	10:30 am	June 1, 2006
	Exit Time	**Permit Expiration Date**
	2:30 pm	May 31, 2011

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
Burt Garofalo, PE, Senior Mining Engineer Bob Henderson, Prep Plant Superintendent	(740) 937-2225 X 105 (740) 937-2225 X 205
Name, Address, & Title of Responsible Official	**Phone Number**
Bruce Hann, General Manager	(740) 942-2225

C. AREAS EVALUATED DURING INSPECTION

S	Permit	S	Flow Measurement	NA	Pretreatment
S	Records/Reports	S	Laboratory	S	Compliance Schedules
M	Operations & Maintenance	S	Effluent/Receiving Waters	S	Self-Monitoring Program
S	Facility Site Review	S	Sludge Storage/Disposal		Other
S	Collection System				

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter. Total maximum employees is approximately 170, with 20 serving at the prep plant.

Fred J Snell — 8/26/13

Fred J. Snell, Inspector, Ohio EPA, Southeast District Office — Date

Jennifer M. Witte — 8/26/13

Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office — Date

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable; N/E = Not Evaluated)

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	YES	NO	N/A	N/E
a. Correct name & mailing address of permittee	X			
b. Correct name & location of receiving waters	X			
c. Product(s) & production rates conform with permit application (industries)	X			
d. Flows & loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection	X			
g. Notification given to state of new, different, or increased discharges	X			
h. All discharges are permitted	X			
i. Number & location of discharge points are as described in permit	X			

Comments:

c: Facility mines and processes coal from the Lower Freeport 6A seam. Coal is room and pillar mined underground, then conveyed to the prep plant, where the coal is washed, sized and and separated from waste rock. Processed coal is then conveyed to silos for storage prior to loading onto rail cars for shipment to coal burning power plants. Refuse is conveyed to a permitted waste disposal area. Coal processing water is piped to the center of the refuse pile, then re-used after solids are settled. Acidic water from refuse area underdrains and storm water from exposed areas flow by gravity to a treatment cell, where aeration and chemical oxidation are performed. Settled sludge is pumped into the refuse disposal area. Effluent from sewage treatment plants serving the main office and bath house and prep plant also flows to the treatment pond. All wastewater flows to a final settling pond prior to discharge to Cross Creek through Outfall 009.

f. A new chemical containing sodium permanganate and sodium hydroxide, ChemLiquid 252, was added to the Pond 9 treatment process.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	YES	NO	N/A	N/E
a. Any significant violations since the last inspection	X			
b. Permittee is taking actions to resolve violations	X			
c. Permittee has compliance schedule		X		
d. Compliance schedule contained in: _____			X	
e. Permittee is meeting compliance schedule			X	

Comments: a. CBOD, and TSS violations were reported at 010. This is a very small sewage treatment plant serving the prep plant employees. The plant was overhauled and restarted in June, 2013. The plant appears to need additional mixed liquor and operating adjustments to establish improved treatment and settling.

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated & Maintained	YES	NO	N/A	N/E
a. Standby power available: Generator: ____ Dual Feed: ____		X		
b. Adequate alarm system available for power or equipment failures	X			
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: No. of shifts: 3 Days/Week: ___	X			
e. Operator holds unexpired license of class required by permit. Class: _		X		
f. Copy of certificate of Operator of Record displayed on-site		X		
g. Minimum operator staffing requirements fulfilled (OAC 3745-7)		X		
h. Routine & preventive maintenance schedule/performed on time	X			
i. Any major equipment breakdown since last inspection		X		
j. Operation & maintenance manual provided & maintained	X			

k. Any plant bypasses since last inspection		X		
l. Regulatory agency notified of bypasses: ____ on MORS ____ 800 No.			X	
m. Any hydraulic and/or organic overloads experienced since last inspection		X		

Record Keeping	**YES**	**NO**	**N/A**	**N/E**
a. Log book provided		X		
a. Log book kept on-site		X		
b. Log book contains the following:				
1. Identification of treatment works		X		
2. Date/time of arrival/departure of ORC		X		
3. Daily record of operation and maintenance activities		X		
4. Laboratory results (unless documented on bench sheets)		X		
5. Identification of person making log entries		X		
c. Is the ORC submitting written notification to Ohio EPA and permittee when a collection system overflow, treatment plant bypass or effluent limit violation has occurred			X	

Comments:

a. Log book was not available at either WWTP during the inspection. The current permit does not require a certified operator or log book. The renewed permit will add these requirements.

H. SLUDGE MANAGEMENT

	YES	**NO**	**N/A**	**N/E**
a. Sludge adequately disposed. Method: Jefferson County "M" POTW	X			
b. If sludge is incinerated, where is ash disposed of?			X	
c. Is sludge disposal contracted? Name: Miller Septic	X			
d. Has amount of sludge generated changed significantly since last inspection		X		
e. Adequate sludge storage provided at facility	X			
f. Land application sites monitored and inspected per state rules			X	
g. Records kept in accordance with state rules		X		
h. Any complaints received in last year regarding sludge		X		
i. Is sludge adequately processed (digestion, dewatering, pathogen control) in accordance with Ohio EPA rules	X			

Comments: g. Request manifest(s) from sludge disposal.

I. SELF-MONITORING PROGRAM

Part 1 – Flow Measurement	**YES**	**NO**	**N/A**	**N/E**
a. Primary flow measuring device properly operated & maintained. Type of device: ____ ultrasonic & parshall flume ____ calculated from influent ____ weir __X__ other ____ ultrasonic & weir specify: _	X			
b. Calibration frequency adequate. Date of last calibration: _____			X	
c. Secondary instruments (totalizers, recorders, etc.) properly operated & maintained			X	
d. Flow measurement equipment adequate to handle expected ranges of flows		X		
e. Actual flow discharged is measured	X			
f. Flow measuring equipment inspection frequency: __X__ Daily ____ Monthly ____ Weekly ____ Other				

Comments: Flow measurements did not appear reliable at 010 and 012, the sewage treatment plants. Pumping rates should be estimated and run time hours used to improve flow estimates. Instantaneous flow is determined by measuring water depth in the pipe. The method is acceptable at 009, which has continuous flow.

Part 2 – Sampling	YES	NO	N/A	N/E
a. Sampling locations(s) are as specified by permit	X			
b. Parameters and sampling frequency agree with permit	X			
c. Permittee uses required sampling method	X			
d. Sample collection procedures are adequate	X			
i. Samples refrigerated during compositing	X			
ii. Proper preservation techniques used	X			
Conform with 40 CFR 136.3	X			
e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, & maintenance records)	X			
f. Adequate records maintained of sampling date, time, exact location, etc.	X			

Comments:

Part 3 – Laboratory, General	YES	NO	N/A	N/E
a. Written Standard Operating Procedures (SOPs) for all analysis performed on-site			X	
b. EPA approved analytical testing procedures used (40 CFR 136.3)	X			
c. If alternate analytical procedures are used, proper approval has been obtained			X	
d. Analyses being performed more frequently than required by permit		X		
e. If (c) is yes, are results reported in permittee's self-monitoring report			X	
f. Commercial laboratory used: Parameters analyzed by commercial lab: Conventionals,fecal coliform, metals Lab name: Quality Environmental Services	X			

Comments: QES performs all sample collection and analysis except pH.

Part 3 – Laboratory, Quality Control/Quality Assurance	YES	NO	N/A	N/E
a. Quality assurance manual provided and maintained			X	
b. Satisfactory calibration and maintenance of instruments and equipment			X	
c. Adequate records maintained	X			
d. Results of latest U.S. EPA quality assurance performance sampling program: Date: NA _____ Satisfactory _____ Marginal _____ Unsatisfactory				

Comments:

J. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Other
009	None	None	None	None	None	Clear	
010	NA	NA	NA	NA	NA	NA	
012	NA	NA	NA	NA	NA	NA	

Comments: There was no discharge from Outfalls 010 and 012 during the inspection.

K. MULTIMEDIA OBSERVATIONS

Collection System	YES	NO	N/A	N/E
a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories		X		
b. Do you notice staining or discoloration of soils, pavement, or floors		X		
c. Do you notice distressed (unhealthy, discolored, dead) vegetation		X		
d. Do you see unidentified dark smoke or dustclouds coming from sources		X		
e. Do you notice any unusual odors or strong chemical smells		X		
f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities		X		

If any of the above are observed, ask the following questions:

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

Comments: