



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

August 22, 2013

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 August 21, 2013, 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 and Jerry Fertig 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 October 22, 2012.

Industrial process wastewater is limited to stormwater runoff collected from the 900 ac facility used to store incoming and outgoing materials, including coke, coal, gravel, and iron ore. Stormwater 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.

Stormwater management includes water from building footer drains, runoff from paved areas of the facility, and various material stockpiles. Stormwater 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. Stormwater 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-gallon 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 stormwater runoff to Lake Erie.

### **Observations**

The following observations were made during the inspection:

1. The system is designed to intercept any stormwater 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 not operating during the inspection, but typically operates at about 640 gpm when running. The plant had been operated earlier in the day. Mr. Weichseldorfer indicated that the equalization basin was dredged approximately 6 years prior to the August 21, 2013 inspection.
3. A log book of repairs and observations is maintained at the WWTP. Jerry Fertig performs routine operations at the WWTP, monitors pH and flow at the facility, and performs the sampling at the facility. Laboratory analysis is performed by Pace Analytical of Minneapolis, MN. Louis Weichseldorfer submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application.
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 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 last calibrated on June 5, 2013.
6. The stormwater pollution prevention plan (SWPPP) dated November 8, 2006 was last updated on October 22, 2012. The annual site certification was also completed on October 22, 2012. The last inspection was completed on July 24, 2013. Employee training on the plan occurred between February 26, 2013 and March 26, 2013.
7. Examination of the final effluent at Outfall 001 was observed as clear with no odor.

#### **NPDES Permit Compliance Review**

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period June 1, 2012 through August 1, 2013 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.

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

No reporting code violations were noted for the time period reviewed; however, the following reporting frequency violation was noted for the time period reviewed:

Reporting Code	Parameter	Sample Frequency	Expected	Reported	Violation Date
00530	Total Suspended Solids	1/Week	1	0	11/22/2012

A sample was not collected the week of November 21-27, 2013. Part III, Item 12 of your permit requires you to notify Ohio EPA of noncompliance, along with corrective measures taken and measures to ensure that it not repeated. PCDC responded to the violation on December 21, 2012 noting that samples were collected on November 20, 2012 and November 29, 2012. Please note that Part III, Item 1 defines the days data may be collected for weekly reporting requirements.

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NPDES permit holders are expected to collect samples within the prescribed days for weekly sampling. No additional information is needed to respond to the violation.

Compliance Schedule Violations

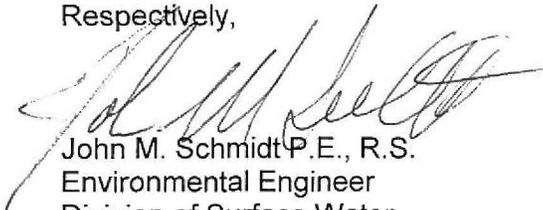
No compliance schedule violations were noted for the reporting period reviewed. The current permit does not contain a compliance schedule.

Bypass and Overflow Reporting:

Ohio EPA notes that bypasses or overflows of the stormwater retention pond are noted to have occurred on October 29-30, 2012 and June 27, 2013. These bypass/overflow events were due to unusually heavy rains in the Conneaut area. A bypass or overflow of your stormwater pond is a violation of your NPDES permit. No additional information is needed to this time to respond to the violations.

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 black ink, appearing to read "John M. Schmidt".

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

JMS/cs

cc: Lou Weichseldorfer, Pittsburgh and Conneaut Dock Co.

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