



Environmental
Protection Agency

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

May 17, 2011

RE: CITY OF EAST PALESTINE
COMPLIANCE EVALUATION INSPECTION
NPDES PERMIT NO. 3PD00042

Mayor and Council
City of East Palestine
City Hall
P.O. Box 231
144 N. Market St.
East Palestine, OH 44413

Dear Ladies and Gentleman:

On April 5, 2011, this writer met with Mr. John Jurjavic and conducted an inspection of the operation and maintenance of the East Palestine Wastewater Treatment Plant located at 220 Park Drive.

The treatment system includes bar screen, fine screen, grit removal, aeration, phosphorus removal (through chemical addition), clarification, UV disinfection, post aeration and the final effluent discharges to Leslie Run. The following is a summary of the inspection:

- 1) All treatment units were operable and in good repair. The aeration tanks had a good brown color and the clarifiers were producing a good secondary effluent. The plant staff does a good job maintaining the treatment facilities and is innovative with employing cost saving measures for the city. It should be noted that covering the weirs of the new clarifiers would save considerable plant man power.
- 2) Effluent data provided by the city was reviewed from January 2009 through April 2011. These violations are attached to this letter. Most of the violations were related to phosphorus limits being exceeded because the construction of phosphorus removal equipment was not completed by August of 2009 as scheduled. These new facilities were completed in January of 2010 and the plant has maintained compliance with the interim limit. By October 1, 2010, the city was to submit a general plan for additional loading reduction to comply with your final phosphorus load of 2.7 kg/day. To date this has not been received. Other alternatives to achieve the final limit could be a stream evaluation of current nutrient impacts or a reduction in non-point source phosphorus. The city must respond in writing the action it will take to comply with Part I,C,A. of the schedule of compliance of the NPDES permit.

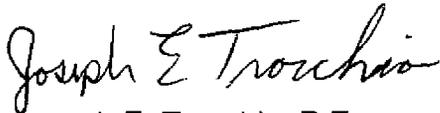
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- 3) It was noted that during storm events the flow at the treatment plant spikes immediately. This would be a good indication that inflow from storm events is entering the city sewers and is an issue. To date efforts by the city have not been sufficient to eliminate overflows from the separate sanitary sewer system to the environment. Furthermore, the Ohio EPA has received reports from local residents with basements flooding. It is our understanding that an engineering firm has been hired to evaluate the capacity of sewer near W. Main/Vine St., and other areas in the city's system. The schedule for the completion of the study and upgrade of system to eliminate these problems will be incorporated into your next NPDES permit.

- 4) The Ohio EPA is in the process of drafting the city's new NPDES permit. It should be available for comment in the near future.

Should you have any comments or questions, feel free to contact me at (330) 963-1193.

Respectfully,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/mt

cc: John Jurjavic, Superintendent
Gary Clark, City Manager

File: Public/Permit Compliance/City of East Palestine

East Palestine Effluent Violations: January 2009 - April 2011

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00042*JD	December 2009	Phosphorus, Total (P)	30D Conc	1.0	1.038	12/1/2009
3PD00042*JD	February 2011	pH, Minimum	1D Conc	6.5	6.2	2/22/2011
3PD00042*JD	February 2011	pH, Minimum	1D Conc	6.5	6.2	2/28/2011
3PD00042*JD	August 2009	Phosphorus, Total (P)	30D Conc	1.0	1.745	8/1/2009
3PD00042*JD	August 2009	Phosphorus, Total (P)	7D Conc	1.5	1.73	8/8/2009
3PD00042*JD	August 2009	Phosphorus, Total (P)	7D Conc	1.5	1.93	8/15/2009
3PD00042*JD	August 2009	Phosphorus, Total (P)	7D Conc	1.5	1.99	8/22/2009
3PD00042*JD	September 2009	Phosphorus, Total (P)	30D Conc	1.0	1.702	9/1/2009
3PD00042*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	1.55	9/1/2009
3PD00042*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	1.77	9/8/2009
3PD00042*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	1.87	9/15/2009
3PD00042*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	1.88	9/22/2009
3PD00042*JD	July 2009	pH, Minimum	1D Conc	6.5	6.4	7/27/2009
3PD00042*JD	October 2009	Phosphorus, Total (P)	30D Conc	1.0	1.48	10/1/2009
3PD00042*JD	October 2009	Phosphorus, Total (P)	7D Conc	1.5	1.57	10/1/2009
3PD00042*JD	October 2009	Phosphorus, Total (P)	7D Conc	1.5	1.51	10/8/2009
3PD00042*JD	November 2009	Phosphorus, Total (P)	30D Conc	1.0	1.3575	11/1/2009