



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 16, 2008

RE: TRUMBULL COUNTY
CITY OF WARREN WWTP
NPDES PERMIT NO. OH0027987
OHIO EPA PERMIT NO. 3PE00008
COMPLIANCE EVALUATION INSPECTION

Mr. Thomas Angelo, Director
City of Warren
2323 Main Avenue, SW
Warren, Ohio 44

Dear Mr. Angelo:

An inspection of the City of Warren Wastewater Treatment Plant (WWTP) was conducted by Mr. Chris Moody and the undersigned on November 17, 2008. In addition to you, the City was represented by Mr. Jim Wilden, Superintendent, and Gary Shaffer, Plant Engineer. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit. During the course of the inspection, evaluations were conducted of the treatment processes, effluent discharge quality, laboratory performance, and biosolids management. Matters related to the facility's biosolids management will be addressed under separate cover by Mr. Moody.

The wet-stream processes of the 16 MGD treatment plant consists of preliminary treatment, primary settling, activated sludge treatment process, final settling, chlorine disinfection, dechlorination, and post aeration. The plant discharges to the Mahoning River via Outfall 001. Waste sludge from the facility is processed to EQS standards and marketed under the trade name, Nature's Blend.

At the time of the inspection, the following observations, findings and/or comments were noted:

1. At the time of the inspection, the general operation and maintenance of the wet-stream treatment processes appeared to be satisfactory. The final effluent at Outfall 001 was clear with no observable adverse impact to the Mahoning River.
2. In addition to the identified Sanitary Sewer Overflow (SSO) at N. Park Ave. & High St., our review noted existing (or potential) overflow structures at the following pumps stations:
 - Main Avenue PS,
 - Parkman Road PS,
 - South Leavitt PS,
 - Brookside PS, and
 - Rio Vista PS.

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Please provide this office with a status update regarding these structures and proposed schedule for elimination of potential overflows at these locations.

3. An overview of the facility laboratory was provided by Mr. Sam Ludwick, Lab Manager. The review noted that the laboratory reported 17 of the 18 parameters on the 2008 DMR-QA Study 28 as "Acceptable".

A review of the facility's Discharge Monitoring Reports (DMRs) received by Ohio EPA for the period February 2007 through November 2008 indicates that the following violations of the NPDES permit at Outfall 001:

City of Warren WWTP (3PE00008): 2/2007 – 11/2008						
Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2007	001	Total Suspended Solids	7D Qty	1817	2288.28	12/8/2007
March 2008	001	Thallium, Total (TL)	30D Conc	4.3	5.	3/1/2008
March 2008	001	Thallium, Total (TL)	30D Qty	0.26	.775	3/1/2008

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
May 2007	001	Phosphorus, Total (P)	1/Week	1	0	05/22/2007
May 2007	001	Nitrite Plus Nitrate,	1/Week	1	0	05/22/2007
May 2007	001	Oil and Grease, Total	1/Week	1	0	05/22/2007
January 2008	001	Oil and Grease, Total	1/Week	1	0	01/15/2008

Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in the imposition of fines of up to \$10,000 per day of violation. It is requested that the City submit a written response to this office documenting the actions taken or proposed to address the above violations and/or deficiencies. Your response shall include dates for initiation and completion of the actions.

Should you have any questions or comments regarding this letter, please contact me at (330) 963-1196.

Respectfully,



Ermelindo Gomes
Environmental Engineer
Division of Surface Water

EG/mt

File: Public/Warren/PC