



Environmental  
Protection Agency

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

February 10, 2011

RE: TRUMBULL COUNTY  
CITY OF WARREN WWTP  
NPDES PERMIT NO. OH0027987  
OHIO EPA PERMIT NO. 3PE00008  
NOTICE OF VIOLATION

Mr. Thomas Angelo, Director  
City of Warren  
2323 Main Avenue, SW  
Warren, Ohio 44481

Dear Mr. Angelo:

Part I, C of the NPDES permit assigned to the Warren Water Pollution Control Facility outlines several reporting requirements that must be met in order to maintain compliance with the permit. Specifically, Part I, C requires:

- a. *The permittee shall conduct a comprehensive analysis of all feasible alternatives necessary to eliminate the bypass at the treatment plant and any overflows in the collection system. This analysis shall address and evaluate the following:*
  - i. *Inflow/infiltration reduction within the collection system;*
  - ii. *Additional wastewater storage and flow equalization;*
  - iii. *Providing additional secondary treatment capacity which includes an analysis of constructing additional secondary capacity as well as an analysis of process changes to enhance secondary treatment capacity;*
  - iv. *The analysis shall also evaluate methods that will enhance the treatment of any bypassed flow;*
  - v. *Costs associated with the respective alternatives;*
  - vi. *A proposed schedule for implementation of recommended improvements (if required) in the collection system and/or the treatment plant;*
- b. *The permittee shall submit a report containing the comprehensive analysis as soon as possible, but no later than 2 Months from the effective date of this NPDES permit. (Event Code 15099)*
- c. *All work necessary to comply with the implementation schedule of the selected alternative shall be fully completed by the expiration date of this permit.*

- See Part III, Part 12. Noncompliance Notification

## 2. Municipal Pretreatment Schedule

- a. *The permittee shall evaluate the adequacy of local industrial user limitations to prevent the introduction of pollutants into the POTW which will interfere with the operation of the POTW, pass through the POTW, be incompatible with the POTW, or*

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*limit wastewater or sludge use options. Technical justification for revising local industrial user limitations to attain compliance with final table limits, along with a pretreatment program modification request, or technical justification for retaining existing local industrial user limitations shall be submitted to Ohio EPA, Central Office Pretreatment Unit, in duplicate, as soon as possible, but no later than 2 Months from the effective date of this permit for all required parameters. (Event Code 52599)*

*Technical justification is required for free cyanide. Technical justification is also required for arsenic, barium, cadmium, total chromium, dissolved hexavalent chromium, copper, lead, nickel, selenium, silver, strontium, thallium, total dissolved solids, and zinc unless screening of wastewater and sludge indicate these pollutants are not present in significant amounts. Furthermore, technical justification is required for any other pollutants where a local limit may be necessary to protect against pass through and interference.*

Please note that these reporting requirements were also part of the original permit (3PE00008\*LD) as well as the modified permit (3PE00008\*MD) which became effective on December 1, 2010. To date, this office has not received any documentation that addresses the above requirements. Please be advised that failure to comply with the terms and conditions of your NPDES permit may be subject to enforcement actions pursuant to Chapter 6111 of the Ohio Revised Code, and can result in fines of up to \$10,000 per day of violation.

Please inform this office, in writing, within 10 days of receipt of this notification as to the actions taken or proposed to address the above violations and/or deficiencies. Your response shall include specific dates for completion of the actions. Should you have any questions or comments regarding this letter, please contact me at (330) 963-1120.

Respectfully,



Tomás Parry  
Environmental Engineer II  
Division of Surface Water

TP/mt

cc: Donna Kniss, Ohio EPA, DSW, NEDO

File: Public/Warren/PC