



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

September 15, 2010

**RE: CITY OF YOUNGSTOWN
NPDES PERMIT NO. 3PE00006
2011 CSI**

Mayor and Council
City of Youngstown
City Hall
16 S Phelps Street
Youngstown, OH 44503

Ladies and Gentlemen:

On May 17, 2010, this office initiated a Compliance Sampling Inspection (CSI) of the Youngstown POTW. The intent of the inspection was to collect effluent samples for analysis at the Ohio EPA laboratory in Columbus and to evaluate Operations and Maintenance (O&M) at the POTW. Finally, compliance with NPDES Permit No. 3PE00006*LD was evaluated.

Following is a report of findings from this inspection.

POTW Inspection

1. The condition of the treatment system was satisfactory at the time of the inspection.
2. All treatment operations were on line at the time of the inspection. Routine preventive maintenance was being performed on various tanks. Preventive maintenance is considered important to avoid failures during critical periods.
3. The contents of the secondary aeration tanks had good color and good mixing. The mixed liquor in the secondary clarifiers had good settling characteristics. The effluent from the secondary clarifiers was low in turbidity.
4. The city maintains an inventory of critical spare parts at the POTW. In the event there is an equipment problem or an issue with compliance, the city contacts this writer to report any problems.
5. One of the sludge holding tanks was not operable at the time of the inspection. The lid for the tank was in need of replacement. It was the understanding of this writer that the floating lid will be replaced and the tank returned to operation.

NPDES Compliance

A review of the compliance record was conducted to determine compliance with the NPDES Permit. The period of record was September 2009 through August 2010. Following are instances of noncompliance identified for the review period.

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2010	001	Zinc, Total Recoverable	1D Conc	180	202.	2/2/2010
February 2010	001	Zinc, Total Recoverable	1D Qty	23.8	24.8485	2/2/2010
May 2010	001	Total Suspended Solids	30D Conc	20	41.4909	5/1/2010
May 2010	001	Total Suspended Solids	30D Qty	2653	6542.28	5/1/2010
May 2010	001	Dissolved Oxygen	1D Conc	5.0	3.7	5/1/2010
May 2010	001	Total Suspended Solids	7D Conc	30	98.694	5/8/2010
May 2010	001	Total Suspended Solids	7D Qty	3980	17218.5	5/8/2010
May 2010	001	Chlorine, Total Residu	1D Conc	0.024	.23	5/18/2010
May 2010	001	Chlorine, Total Residu	1D Conc	0.024	.06	5/21/2010
June 2010	001	Total Suspended Solids	30D Conc	20	68.6531	6/1/2010
June 2010	001	Total Suspended Solids	7D Conc	30	50.626	6/1/2010
June 2010	001	Total Suspended Solids	30D Qty	2653	7891.10	6/1/2010
June 2010	001	Total Suspended Solids	7D Qty	3980	7859.67	6/1/2010
June 2010	001	Total Suspended Solids	7D Conc	30	72.816	6/8/2010
June 2010	001	Total Suspended Solids	7D Qty	3980	9425.62	6/8/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.024	.06	6/14/2010
June 2010	001	Total Suspended Solids	7D Conc	30	135.526	6/15/2010
June 2010	001	Total Suspended Solids	7D Qty	3980	12910.1	6/15/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.024	.065	6/17/2010
June 2010	001	Chlorine, Total Residu	1D Conc	0.024	.08	6/18/2010
June 2010	001	Total Suspended Solids	7D Conc	30	42.686	6/22/2010
June 2010	001	Total Suspended Solids	7D Qty	3980	4489.28	6/22/2010
July 2010	001	Total Suspended Solids	30D Conc	20	22.831	7/1/2010
July 2010	001	Oil and Grease, Total	1D Conc	10	13.7	7/9/2010
July 2010	001	Oil and Grease, Total	1D Conc	10	30.9	7/16/2010
July 2010	001	Total Suspended Solids	7D Conc	30	56.896	7/22/2010
July 2010	001	Total Suspended Solids	7D Qty	3980	5038.01	7/22/2010
July 2010	001	Zinc, Total Recoverabl	1D Conc	180	246.	7/27/2010
July 2010	001	Chlorine, Total Residu	1D Conc	0.024	.145	7/29/2010

Be advised that violations of the NPDES Permit are considered violations of Ohio Revised Code 6111.07 and are considered contempt of the 2002 Consent Order.

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2002 Consent Agreement

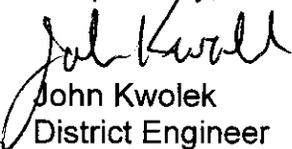
In 2002, the city entered into a Consent Agreement with USEPA and Ohio EPA. The only outstanding item from Part I,C of the Consent Agreement is to finalize the LTCP. However, it is understood by this writer that the coordinator for the Maintenance Data Management System for the collection system has transferred to another position. Please provide a response that explains how the data management system is currently being implemented in the absence of the previous coordinator. Please include whether the coordinator's position has been filled.

Sample Results

The analytical results for samples collected May 17 and 18, 2010 are enclosed with this letter. The results identified no toxicity and no violations of the NPDES Permit.

You may contact this writer at (330) 963-1251 or at john.kwolek@epa.state.oh.us to discuss any questions you may have regarding this inspection report. Please provide a response that describes actions that have been taken by the city to provide adequate coordination of the collection system's Maintenance Data Management System.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK:cl
Enclosures (1)

cc: Charles Shasho, Dept. of Public Works
Tom Mirante, Assistant Superintendent, Youngstown POTW
Peggy Malone, Ohio AGO
Mark Mann, Ohio EPA-DSW-CO