



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

July 18, 2013

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

Thomas Angelo, Director
Water Pollution Control Department
City of Warren
2323 Main Avenue, SW
Warren, Ohio 44481

Mr. Angelo:

Ohio EPA conducted a compliance evaluation inspection of the above-referenced treatment works on June 18, 2013. Mr. Jim Wilden represented the City of Warren and Mr. Chris Moody and the undersigned represented Ohio EPA. The inspection was performed to evaluate the operation and maintenance of the treatment works, and determine the facility's overall compliance with the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) permit.

The existing 16-MGD treatment system consists of preliminary screening and grit removal, primary settling, extended aeration activated sludge treatment process, final settling, chlorine disinfection, dechlorination, and post aeration. Waste-activated sludge is processed to EQS standards and marketed under the trade name, Nature's Blend. Treated effluent is discharged to the Mahoning River.

During the inspection, the following observations and/or deficiencies were noted:

1. The overall operation and maintenance of the treatment works appeared to be satisfactory. All treatment components appeared to be in working condition.
2. A floating scum layer was observed in one of the primary clarifier tanks. Mr. Wilden explained that the clarifier had recently been put back online, and that the scum issue would be addressed.
3. The mixed liquor in the aeration tanks was a chocolate brown color, indicative of a healthy bacterial population.
4. Algal growth was observed in the final clarifiers. Mr. Wilden explained that this continues to be an ongoing problem, and that the clarifiers are periodically cleaned every couple of weeks.
5. Cigarette butts and other trash were observed in the sodium bisulfite containment structure. Areas with treatment equipment and chemical storage tanks should be kept clean and remain smoke-free.

6. Please provide documentation describing when the thermometers in the influent and effluent samplers were last certified.
7. The final effluent being discharged appeared to be clear, and was not causing any immediately-noticeable, adverse impacts to the receiving stream.
8. Foaming was observed at Outfall 001, however, it was dissipating quickly.

A review of the facility's monthly electronic Discharge Monitoring Reports (eDMRs) received by Ohio EPA for the period May 2010 – May 2013 indicated violations of the terms and conditions contained in the NPDES permit. The specific instances of noncompliance include:

Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PE00008*MD	March 2011	001	00530	Total Suspended Solids	7D Qty	1817	2116.87	3/1/2011
3PE00008*MD	March 2011	001	00530	Total Suspended Solids	7D Qty	1817	1848.31	3/8/2011

The eDMR review also revealed that the ammonia values for winter 2012/2103 were significantly higher than in previous years. Have there been any recent process or operational changes at the treatment plant that could have led to the ammonia levels climbing last winter? Please provide an explanation for the sudden elevation in winter ammonia values.

During the eDMR review, this office also noted that as a whole, the influent (601) Total Filterable Residue values appear to be less than the effluent (001) values. As such, please provide a description of the current sampling technique and laboratory analyses being used to collect and analyze for Total Filterable Residue. Please note that the NPDES permit requires 24-hr flow-proportionate composite samples for Total Filterable Residue.

Additionally, please review, and revise if necessary, the values reported for Total Filterable Residue monitoring for April 2013. It appears that the data was entered incorrectly, or that there may have been an issue with the eDMR software at the time of submittal. For specific guidance on any issues related to entering eDMR information, please contact James Roberts of Ohio EPA at (614) 644-2054.

The eDMR review also indicated a number of instances where the A-substitution code "AE", or analytical data not valid, is being reported for missing monitoring data due to equipment being down for repair and/or maintenance. Please note that when data is not reported due to equipment failure or malfunction, the A-substitution code "AD", automatic analyzer out of service, must be used, along with a brief description of the problem. Please ensure that the eDMR data is revised to indicate the appropriate A-substitution code.

This office also noted a number of instances where Escherichia coli (E.coli) and Fecal Coliform values were reported as "AE" due to high plant flows and/or malfunctioning equipment (eg. Chlorinator down, etc.) Further discussion with the City of Warren about this issue indicated that there is valid laboratory data for these monitoring events. Please note that in these circumstances, where samples have been properly collected and analyzed even though certain treatment components may have been malfunctioning or out of service, the analytical value must be reported (for any monitoring parameter). If the value exceeds an NPDES effluent limit, then an explanation may be included as a comment for that entry. Please ensure that the eDMR data is revised to indicate the results of the laboratory analyses.

It was also indicated to this office that the City of Warren provides more frequent sample collection and laboratory analysis than is required for certain monitoring parameters in the NPDES permit. Please note that Part III, 4.E of the NPDES permit requires that this information be submitted to Ohio EPA in the eDMRs. Please revise the eDMRs to include the additional sampling results.

In addition to the inspection findings and the eDMR review, Part I, C.2 of the NPDES permit required the City of Warren to submit to Ohio EPA, within five months of the effective date of the NPDES permit, a report evaluating the ability of the existing treatment works to meet the E. coli monitoring limits that became effective on May 1, 2013. To date, this office has not received the required E. coli status report.

An inspection of the City of Warren's collection system indicated that the Sanitary Sewer Overflow (SSO) at North Park Avenue and High Street was still active. The SSO was originally required to be eliminated by the expiration date of the 3PE00008*LD and 3PE00008*MD permits, which was January 31, 2012. At your request, in a letter from you to Ohio EPA dated September 15, 2011, the deadline for eliminating the SSO was extended into the 3PE00008*ND permit. Part I, C.3 of the current NPDES permit (3PE00008*ND) required that this SSO be eliminated by no later than July 31, 2012. Thus, the City of Warren has failed to meet the deadline dates for the SSO elimination specified in the last two NPDES permit cycles (LD and ND permits).

This office has since received written notification from the City of Warren on July 17, 2013 indicating that the SSO was permanently sealed off on June 25, 2013. Please note that Part I, C.3.b of the current NPDES permit required that the City of Warren notify Ohio EPA that the SSO was eliminated by no later than 14 days after the work was completed. Thus, the City of Warren has failed to meet this requirement as well.

In addition to the downtown SSO, an inspection was also performed of the existing (or potential) overflow structures at the Parkman Road Pump station and the Rio Vista Pump Station. Please provide this office with a status update regarding these structures, how often they overflow, and a proposed schedule for control/elimination of the potential overflows at these locations.

Please note that a Storm Water Pollution Prevention Plan (SWP3) is required for the facility. Part IV, A of the NPDES permit requires that a SWP# be submitted to this office by no later than six months from the effective date of the NPDES permit, which was April 1, 2012. To date, a SWP3 has not been received. Please refer to Parts IV, V, and VI of the NPDES permit for additional storm water mitigation requirements.

Please be advised that violations of the terms and conditions of the NPDES permit are subject to appropriate enforcement action pursuant to Chapter 6111 of the Ohio Revised Code. Such actions can result in fines of up to \$10,000 per day of violation.

Please submit to this office, within 14 days' receipt of this letter, written documentation describing the course of action that will be taken, or has been taken, to address the items identified in this letter. Your response shall include specific dates for the initiation and completion of this action plan.

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JULY 18, 2013
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Should you have any questions or comments regarding this letter, please contact this office at (330) 963-1120.

Respectfully,

A handwritten signature in cursive script that reads "Tomás Parry".

Tomás Parry, P.E.
Environmental Engineer II
Division of Surface Water

TP/cs

Attachments: Photographs

cc: Jim Wilden, City of Warren, Water Pollution Control Department



