



John G. Newsome, P.E.,
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January 14, 2022

VIA EMAIL ONLY

TMDL Program
Ohio EPA, Division of Surface Water
epatmdl@epa.ohio.gov
P.O. Box 1049
Columbus, OH 43216-1049

Re: Comments on Ohio EPA's Draft Loading Analysis Plan for the Rocky River Watershed

Dear TMDL Coordinating Team:

The Association of Ohio Metropolitan Wastewater Agencies ("AOMWA") appreciates the opportunity to comment on Ohio EPA's Draft Loading Analysis Plan ("Draft LAP") for the Rocky River Watershed. AOMWA is a not-for-profit trade association that represents the interests of public wastewater agencies across the state of Ohio, serving more than 4 million Ohioans and successfully treating more than 320 billion gallons of wastewater each year.¹ AOMWA's members include the Northeast Ohio Regional Sewer District ("NEORS"), which is responsible for operating and maintaining a combined sewer system with six permitted outfalls that discharge into the Rocky River watershed.

Accordingly, AOMWA writes to support the comments raised in the letter submitted by NEORS. NEORS's comments request that Ohio EPA: (1) clarify that the 126 count E. coli/100 mL referenced in the Draft LAP will not be set as an end-of-pipe limit for CSO discharges; (2) align the Draft LAP and eventual TMDL with CSO long-term control plans; (3) develop wet-weather standards for CSOs; and (4) revise the Draft LAP based on data collected by NEORS.

AOMWA appreciates Ohio EPA's consideration of these comments as it finalizes the Rocky River LAP. Should you have any questions, please contact Rees Alexander at rees.alexander@squirepb.com or (614) 365-2798. Thank you again for your attention to and consideration of these comments.

¹ AOMWA members include cities of Akron, Avon Lake, Bowling Green, Canton, Columbus, Dayton, Euclid, Fairfield, Hamilton, Lancaster, Lima, Marysville, Middletown, Newark, Portsmouth, Solon, Springfield, Wadsworth, Warren, and Butler County, Greene County, Hamilton County, Summit County, the Metropolitan Sewer District of Greater Cincinnati, the Northeast Ohio Regional Sewer District, and the Tri-Cities Regional Wastewater Authority.

Sincerely,

A handwritten signature in blue ink, appearing to read "John G. Newsome". The signature is fluid and cursive, with a long horizontal stroke at the end.

John G. Newsome, P.E.
President, AOMWA

cc: (via email)
Rees Alexander, Esq., Squire Patton Boggs (US) LLP
Katherine Wenner, Esq., Squire Patton Boggs (US) LLP