



John G. Newsome, P.E.,  
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May 27, 2022

**VIA EMAIL ONLY**

TMDL Program  
Ohio EPA, Division of Surface Water  
[epatmdl@epa.ohio.gov](mailto:epatmdl@epa.ohio.gov)  
P.O. Box 1049  
Columbus, OH 43216-1049

**Re: Comments on Ohio EPA's Lake Erie Central Basin Tributaries Watershed  
Draft Loading Analysis Plan**

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 Lake Erie Central Basin Tributaries 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.<sup>1</sup> AOMWA's members include the Northeast Ohio Regional Sewer District ("NEORS"), which is responsible for operating and maintaining a combined sewer system with three permitted outfalls that discharge into Lake Erie Central Basin Tributaries located in Cuyahoga County.

Accordingly, AOMWA writes to support comments raised in the letter submitted by NEORS, including the requests that Ohio EPA: (1) validate sources of impairment, including information provided in Tables 2 and 4 of the Draft LAP relating to Doan Brook and Euclid Creek; (2) align the LAP and eventual TMDL with CSO long-term control plans; (3) develop wet-weather standards for CSOs; and (4) revise the LAP and develop the TMDL with more recent data by conducting follow-up monitoring of Doan Brook, Euclid Creek, and Nine Mile Creek prior to developing the TMDL.

AOMWA appreciates Ohio EPA's consideration of these comments as it finalizes the Lake Erie Central Basin Tributaries Watershed Draft LAP. Should you have any questions, please contact Rees Alexander at [rees.alexander@squirepb.com](mailto:rees.alexander@squirepb.com) or (614) 365-2798. Thank you again for your attention to and consideration of these comments.

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<sup>1</sup> 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