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VIA E-MAIL (epatmdl@epa.ohio.gov)

Ohio EPA - Division of Surface Water (DSW)
Attn: 303(d) Comments
P.O. Box 1049
Columbus, OH 43215

Re: Draft Ohio 2020 Integrated Water Quality Monitoring and Assessment Report

Dear Rule Coordinator:

The Association of Ohio Metropolitan Wastewater Agencies (“AOMWA”) appreciates the opportunity to comment concerning the Draft Ohio 2020 Integrated Water Quality Monitoring and Assessment Report (“Draft Integrated Report”). 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 300 billion gallons of wastewater each year.¹ AOMWA and its members have a keen interest in the Draft Integrated Report and the water quality policy recommendations included within the Report.

Accordingly, AOMWA provides the following comments concerning the Draft Integrated Report:

- We fully support the issues raised in the comment letter submitted by the Northeast Ohio Regional Sewer District (“NEORS”), and incorporate those comments in their entirety as if rewritten herein. NEORS’s comments include a request that Ohio EPA include NEORS in the stakeholder engagement process for the statewide bacteria TMDL; AOMWA also requests to be included as a stakeholder in the development process for the statewide bacteria TMDL.
- The Draft Integrated Report includes a new assessment methodology for evaluating algae in the vicinity of Sandusky Bay and the Central Basin. While Ohio EPA typically develops water quality standards through a separate notice and comment process, it appears Ohio EPA is consolidating the assessment methodology with the actual assessments of specific water bodies. This approach does not provide the same opportunity for public engagement, and AOMWA believes that the development of algae assessment

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

methodologies should be done as part of a notice and comment process separate and apart from that of the Draft Integrated Report.

- Ohio EPA has modified its method for prioritizing TMDLs; previously, the Agency identified priorities based on a numeric system, but the Agency now identifies them based on “high,” “medium,” or “low” priority. See Draft Integrated Report at pg. J-7. The Agency has explained that its modified method of identifying priorities designed to be compatible with U.S. EPA’s ATTAINS system. As many waters are identified as “high” priority at this time, it is unclear which are actually planned to be addressed in the very near future. AOMWA requests that the Agency consider modifying this approach to include the “high,” “medium,” and “low” information while retaining its numeric prioritization identification (i.e., a particular water body’s priority could be identified by both the high/medium/low designation and the traditional numeric priority identification). This modified approach would be compatible with U.S. EPA’s ATTAINS system, but would still provide clarity as to which waterbodies are likely to be addressed as part of the TMDL process in the near future.

AOMWA appreciates your consideration of these comments and Ohio EPA’s willingness to engage AOMWA and other stakeholders on this issue. We look forward to working with the Agency on this and other water quality-related issues moving forward. Should you have any questions, please contact Rees Alexander at rees.alexander@squirepb.com or (614) 365-2798. Thank you for your attention to and consideration of these comments.

Sincerely,



Brian M. Gresser, P.E.
President, AOMWA

cc: (via e-mail)
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Rees Alexander, Squire Patton Boggs (US) LLP