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August 12, 2019

**VIA E-MAIL** (EPATMDL@epa.ohio.gov)  
Rule Coordinator  
Ohio EPA - Division of Surface Water (DSW)  
P.O. Box 1049  
Columbus, OH 43215

**Re: Ohio EPA DSW's Proposed Two-Pronged Approach to Surveying and Monitoring Aquatic Life in Ohio's Streams and Rivers**

Dear Rule Coordinator:

The Association of Ohio Metropolitan Wastewater Agencies ("AOMWA") appreciates the opportunity to comment on Ohio EPA DSW's Two-Pronged Approach to Surveying and Monitoring Aquatic Life in Ohio's Streams and Rivers. 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.<sup>1</sup>

AOMWA supports Ohio EPA's efforts to streamline the process for updating surveying and monitoring data for Ohio's streams and rivers, which for some watersheds is now decades old. The Fact Sheet associated with this proposed approach indicates that the Agency plans to reconfigure specific watersheds into 37 larger "project areas" "[t]o obtain better estimates of statewide conditions and pollutants." AOMWA's support for this approach is based on our understanding that this information would be used to identify statewide conditions and to "target local concerns" and "guide site selection for targeted surveys in project areas[,] but such data would not itself be used to replace these targeted surveys.

In particular, AOMWA believes that it would be inappropriate to use an assessment of one of the expansive "project areas" to replace the specific water quality sampling that is traditionally used to develop the Clean Water Act Section 303(d) lists, which are in turn used to develop TMDLs, or the site-specific water quality sampling associated with NPDES Permit development. AOMWA believes that even under the Agency's new two-pronged approach, Section 303(d) lists and NPDES Permits must be based on precise evaluations of local data for a more specific, local water body. This understanding appears to be consistent with statements made at Ohio EPA's July 10<sup>th</sup> webinar, but we would appreciate clarification from the Agency that the surveying and

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

monitoring will not be used as a substitute for more targeted sampling used in developing TMDLs and water quality criteria as part of the NPDES permitting process.

AOMWA would also appreciate additional detail regarding the proposed approach related to how sampling sites are to be randomly selected, how selected sites are evaluated as being representative, and the water quality parameters evaluated at each site.

AOMWA appreciates your consideration of these comments and Ohio EPA's willingness to engage AOMWA and other stakeholders on this issue. AOMWA and its members look forward to working with the Agency on this rulemaking and other aspects of the water quality monitoring program moving forward.

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 for your attention to and consideration of these comments.

Sincerely,



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

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