



Frank Greenland, PE
President, AOMWA
3900 Euclid Avenue
Cleveland, OH 44115
(216) 881-6600

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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 Middle Scioto River Watershed and Selected Tributaries

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 Middle Scioto River Watershed and Selected Tributaries. 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 membership includes the City of Columbus, which is located within this watershed.

The Draft LAP includes a recreational use water quality target of 126 count *E. coli* / 100 mL. Consistent with AOMWA's comments in other watersheds, AOMWA remains concerned that Ohio EPA may intend to apply the 126 count *E. coli* / 100 mL target as an end-of-pipe limit for Combined Sewer Overflow ("CSO") discharges. If a waste load allocation is calculated for CSOs, it would be more appropriate to use the expected *E. coli* concentration in remaining overflows based on the control technology identified in the entity's Long-Term Control Plan, rather than the instream *E. coli* target. Given that it appears several CSOs are located in the Middle Scioto River Watershed, AOMWA requests clarification on Ohio EPA's intent behind the approach for any CSOs located in the watershed.

¹ AOMWA members include cities of Akron, Avon Lake, Bowling Green, Canton, Columbus, Dayton, Euclid, Fairfield, Hamilton, Lancaster, Lima, Lorain, 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.

AOMWA appreciates Ohio EPA's consideration of these comments as it finalizes the Middle Scioto River Watershed and Selected Tributaries Draft 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.

Sincerely,

A handwritten signature in cursive script that reads "Frank P. Greenland".

Frank Greenland, PE
President, AOMWA

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