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VIA EMAIL ONLY

Ohio EPA - Division of Surface Water
epatmdl@epa.ohio.gov
P.O. Box 1049
Columbus, OH 43215

Re: Comments on Ohio EPA's Quality Assurance Project Plan for Maumee Area of Concern Beneficial Use Impairment #8 (Eutrophication or Undesirable Algae)

Dear Quality Assurance Project Plan Team:

The Association of Ohio Metropolitan Wastewater Agencies ("AOMWA") appreciates the opportunity to comment on Ohio EPA's Quality Assurance Project Plan Associated with the partial evaluation of the Maumee Area of Concern ("AOC") Beneficial Use Impairment #8 (eutrophication or undesirable algae) in 2021. 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

Consistent with AOMWA's prior comments on nutrient issues, AOMWA supports a "weight-of-evidence" approach to nutrient evaluation. Such an approach recognizes that nutrient impacts cannot be identified strictly by the measurement of nutrient concentrations. Complementary water quality data must be considered to determine whether nutrient (or algal) impairments exist. For this reason, AOMWA requests that the Agency complete a more comprehensive evaluation that includes sampling for chlorophyll. Given that the beneficial use impairment for the AOC is Eutrophication or Undesirable Algae, it appears that chlorophyll should also be evaluated. This approach would also be consistent with the Agency's recent assessment of the Cuyahoga River AOC.²

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 and the Northeast Ohio Regional Sewer District.

² *Ohio EPA, Removal Recommendation for the Eutrophication or Undesirable Algae Beneficial Use Impairment in the Cuyahoga River Area of Concern* (April 2021), https://www.epa.gov/sites/production/files/2021-04/documents/cuyahoga_river_aoc_eutrophication_bui_removal_recommendation.pdf.

AOMWA appreciates your consideration of these comments. 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,



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

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