



John G. Newsome, P.E.,
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February 7, 2022

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 Southern Ohio River Tributaries Watershed

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 Southern Ohio River 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.¹

Consistent with AOMWA's comments on the Black River Preliminary Draft TMDL Report, AOMWA is 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. While it is unclear whether there are any CSOs in the watershed, to the extent that there are CSOs in the watershed, this water quality standard should not be imposed as an end-of-pipe limit for those CSO discharges. AOMWA, therefore, requests clarification on Ohio EPA's intent behind the approach for any CSOs located in the Southern Ohio River Tributaries Watershed.

AOMWA appreciates Ohio EPA's consideration of these comments as it finalizes the Southern Ohio River Tributaries Watershed 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.

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, 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