

National Pollutant Discharge Elimination System (NPDES) Permit Program**PUBLIC NOTICE****NPDES Permit to Discharge to State Waters**

Ohio Environmental Protection Agency
Permits Section
50 West Town St., Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049
(614) 644-2001

Public Notice No.: 210315
Date of Issue of Public Notice: 3/7/2025
Name and Address of Applicant: City of Marion, 1810 Marion-Agosta Road, Marion, OH, 43302

Name and Address of Facility
Where Discharge Occurs: City of Marion, Div of Water Pollution Control, 1810 Marion-Agosta Road, Marion, OH, 43302, Marion County

Outfall Flow and Location List:

001	10500000 GPD	Lat: 40.5882989	Long: -83.18005103
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Receiving Stream: Little Scioto River

Nature of Business: Municipal WWTP

Key parameters to be limited
in the permit are as follows: Total Suspended Solids, Nitrogen, Ammonia (NH₃), CBOD 5 day, Chlorine, Total Residual, Zinc, Total Recoverable, Dissolved Oxygen, E. coli, Oil and Grease, Hexane Extr Method, pH, Maximum, pH, Minimum, Bis(2-ethylhexyl) Phthalate, Silver, Total Recoverable, Dibenzo (A,H) Anthracene

The Director has, after evaluation of pertinent technical, social, and economic information, determined that the discharge specified in this permit will result in a change from ambient in water quality of the receiving stream. This change will not interfere with or become injurious to the existing designated use.

On the basis of preliminary staff review and application of standards and regulations, the director of the Ohio Environmental Protection Agency will issue a permit for the discharge subject to certain effluent conditions and special conditions. The draft permit will be issued as a final action unless the director revises the draft after consideration of the record of a public meeting or written comments, or upon disapproval by the administrator of the U.S. Environmental Protection Agency. Any person may submit written comments on the draft permit and administrative record and may request a public hearing. A request for public hearing shall be in writing and shall state the nature of the issues to be raised. In appropriate cases, including cases where there is significant public interest, the director may hold a public hearing on a draft permit or permits prior to final issuance of the permit or permits. Following final action by the director, any aggrieved party has the right to appeal to the Environmental Review Appeals Commission.

Interested persons are invited to submit written comments upon the discharge permit. Comments should be submitted in person, by E-mail or by mail no later than 30 days after the date of this public notice. Comments should be e-mailed to epa.dswcomments@epa.ohio.gov or delivered or mailed to both of the following locations: 1) Ohio Environmental Protection Agency, Lazarus Government Center, Division of Surface Water, Permits Processing Unit, 50 West Town St., Suite 700, P.O. Box 1049, Columbus, Ohio 43216-1049 and 2) Ohio Environmental Protection Agency, Northwest District Office 347 North Dunbridge Road, Bowling Green, Ohio 43402.

The Ohio EPA permit number and public notice numbers should appear next to the above address on the envelope and on each page of any submitted comments. All comments received no later than 30 days after the date of this public notice will be considered.

Proposed Water Quality Based Effluent Limitations: This draft permit contains water quality based effluent limitation(s) (WQBELs). In accordance with Ohio Revised Code Section 6111.03(J)(3), the Director establishes WQBELs after considering, to the extent consistent with the Federal Water Pollution Control Act, evidence relating to the technical feasibility and economic reasonableness of removing the polluting properties from those wastes and to evidence relating to conditions calculated to result from that action and their relation to benefits to the people of the state and to accomplishment of the purposes of this chapter. This determination was made based on data and information available at the time the permit was drafted, which included the contents of the of the timely submitted National Pollutant Discharge Elimination System (NPDES) permit renewal application, along with any and all pertinent information available to the Director.

This public notice hereby allows the permittee to provide to the Director for consideration during this public comment period, additional site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness for achieving compliance with WQBEL(s). This information shall be submitted to the addresses listed above.

Should the applicant need additional time to review, obtain or develop site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness of achieving compliance with WQBEL(s), written notification for any additional time shall be sent no later than 30 days after the date of this public notice to the Director at the addresses listed above.

Should the applicant determine that compliance with a WQBEL is technically and/or economically unattainable, the permittee may submit an application for a variance to the applicable WQBEL in accordance with the terms and conditions set forth in Ohio Administrative Code (OAC) Rule 3745-1-38 no later than 30 days after the date of this public notice to the addresses listed above.

Alternately, the applicant may propose the development of site-specific water quality standard(s) pursuant to OAC Rule 3745-1-39. The permittee shall submit written notification to the Director regarding their intent to develop site-specific water quality standards for the pollutant at issue to the addresses listed above no later than 30 days after the date of this public notice.

The application, fact sheets, permit including effluent limitations, special conditions, comments received, and other documents are available for inspection and may be copied at a cost of 5 cents per page at the Ohio Environmental Protection Agency at the address shown on page one of this public notice any time between the hours of 8 a.m. and 4:30 p.m., Monday through Friday. Copies of the public notice are available at no charge at the same address. Individual NPDES draft permits that are in public notice are available on DSW's web site: <https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/list-of-draft-permit-public-notices>

Mailing lists are maintained for persons or groups who desire to receive public notice for all applications in the state or for certain geographical areas. Persons or groups may also request copies of fact sheets, applications, or other documents pertaining to specific applications. Persons or groups may have their names put on such a list by making a written request to the agency at the address shown above.

Ohio EPA Permit No.: 2PD00011*SD
Application No: OH0026352

Action Date: TBD
Effective Date: TBD
Expiration Date: TBD

DRAFT COPY
SUBJECT TO REVISION
OHIO EPA

Ohio Environmental Protection Agency
Authorization to Discharge Under the
National Pollutant Discharge Elimination System

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq., hereinafter referred to as the "Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111),

City of Marion

is authorized by the Ohio Environmental Protection Agency, hereinafter referred to as "Ohio EPA," to discharge from the City of Marion Division of Water Pollution Control, located at 1810 Marion-Agosta Road, Marion, Ohio, Marion County, and discharging to the Little Scioto River at River Mile 6.4 in accordance with the conditions specified in Part I, II, and III, of this permit.

This permit is conditioned upon payment of applicable fees as required by Section 3745.11 of the Ohio Revised Code.

This permit and the authorization to discharge shall expire at midnight on the expiration date shown above. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as required by the Ohio EPA no later than 180 days prior to the above date of expiration.

Anne M. Vogel
Director

Total Pages: 53

PART I, A. INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting 36 months [specific calendar dates will be inserted upon final issuance], the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 2PD00011001. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

Table - Final Outfall - 001 – Interim

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Day	Maximum Indicating Thermometer	All
00300 - Dissolved Oxygen - mg/l	-	5.0	-	-	-	-	-	1/Day	Continuous	All
00530 - Total Suspended Solids - mg/l	-	-	18	12	-	715	477	3/Week	24hr Composite	All
00552 - Oil and Grease, Hexane Extr Method - mg/l	10	-	-	-	-	-	-	1 / 2 Weeks	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	1.5	1.0	-	60	40	3/Week	24hr Composite	Summer
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	4.0	2.5	-	159	100	3/Week	24hr Composite	Winter
00625 - Nitrogen Kjeldahl, Total - mg/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
00630 - Nitrite Plus Nitrate, Total - mg/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
00665 - Phosphorus, Total (P) - mg/l	-	-	-	-	-	-	-	1/Week	24hr Composite	All
00671 - Orthophosphate, Dissolved (as P) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00981 - Selenium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01074 - Nickel, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01079 - Silver, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01094 - Zinc, Total Recoverable - ug/l	270	-	-	-	11	-	-	1/Month	24hr Composite	All
01113 - Cadmium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01114 - Lead, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
01118 - Chromium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01119 - Copper, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01220 - Chromium, Dissolved Hexavalent - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
31648 - E. coli - #/100 ml	-	-	284	126	-	-	-	1/Day	Grab	Summer
32101 - Bromodichloromethane - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
34556 - Dibenzo (A,H) Anthracene - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
39100 - Bis(2-ethylhexyl) Phthalate - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Continuous	All
50060 - Chlorine, Total Residual - mg/l	0.019	-	-	-	-	-	-	1/Day	Multiple Grab	Summer
50092 - Mercury, Total (Low Level) - ng/l	-	-	-	-	-	-	-	1/Month	Grab	All
51173 - Cyanide, Free (Low-Level) - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
61425 - Acute Toxicity, Ceriodaphnia dubia - TUa	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61426 - Chronic Toxicity, Ceriodaphnia dubia - TUc	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61427 - Acute Toxicity, Pimephales promelas - TUa	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61428 - Chronic Toxicity, Pimephales promelas - TUc	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61941 - pH, Maximum - S.U.	9.0	-	-	-	-	-	-	1/Day	Continuous	All
61942 - pH, Minimum - S.U.	-	6.5	-	-	-	-	-	1/Day	Continuous	All
70300 - Residue, Total Filterable - mg/l	-	-	-	-	-	-	-	1 / 2 Weeks	24hr Composite	All
80082 - CBOD 5 day - mg/l	-	-	15	10	-	596	398	3/Week	24hr Composite	All

Notes for Station Number 2PD00011001:

* Effluent loadings based on average design flow of 10.5 MGD.

a. Sampling at station 2PD00011001 and 2PD00011603 shall occur the same day.

b. Total residual chlorine - See Part II, Item N.

c. Mercury - See Part II, Item W.

d. Dissolved Orthophosphate - See Part II, Item U.

e. Toxicity Biomonitoring - See Part II, Item AA.

f. Bis(2-ethylhexyl) phthalate - See Part II, Items N, V, and Y.

g. Anthracene - See Part II, Item N.

h. Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate - See Part I,C Item 3.

PART I, A. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. During the period beginning 36 months from the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 2PD00011001. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

Table - Final Outfall - 001 – Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Day	Maximum Indicating Thermometer	All
00300 - Dissolved Oxygen - mg/l	-	5.0	-	-	-	-	-	1/Day	Continuous	All
00530 - Total Suspended Solids - mg/l	-	-	18	12	-	715	477	3/Week	24hr Composite	All
00552 - Oil and Grease, Hexane Extr Method - mg/l	10	-	-	-	-	-	-	1 / 2 Weeks	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	1.5	1.0	-	60	40	3/Week	24hr Composite	Summer
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	4.0	2.5	-	159	100	3/Week	24hr Composite	Winter
00625 - Nitrogen Kjeldahl, Total - mg/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
00630 - Nitrite Plus Nitrate, Total - mg/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
00665 - Phosphorus, Total (P) - mg/l	-	-	-	-	-	-	-	1/Week	24hr Composite	All
00671 - Orthophosphate, Dissolved (as P) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00981 - Selenium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01074 - Nickel, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01079 - Silver, Total Recoverable - ug/l	8.3	-	-	1.3	0.33	-	0.052	1/Month	24hr Composite	All
01094 - Zinc, Total Recoverable - ug/l	270	-	-	-	11	-	-	1/Month	24hr Composite	All
01113 - Cadmium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01114 - Lead, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
01118 - Chromium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01119 - Copper, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01220 - Chromium, Dissolved Hexavalent - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
31648 - E. coli - #/100 ml	-	-	284	126	-	-	-	1/Day	Grab	Summer
32101 - Bromodichloromethane - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
34556 - Dibenzo (A,H) Anthracene - ug/l	-	-	-	0.0014	-	-	0.000056	1/Month	24hr Composite	All
39100 - Bis(2-ethylhexyl) Phthalate - ug/l	1100	-	-	4.1	44	-	0.16	1/Month	24hr Composite	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Continuous	All
50060 - Chlorine, Total Residual - mg/l	0.019	-	-	-	-	-	-	1/Day	Multiple Grab	Summer
50092 - Mercury, Total (Low Level) - ng/l	-	-	-	-	-	-	-	1/Month	Grab	All
51173 - Cyanide, Free (Low-Level) - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
61425 - Acute Toxicity, Ceriodaphnia dubia - TUa	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61426 - Chronic Toxicity, Ceriodaphnia dubia - TUc	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61427 - Acute Toxicity, Pimephales promelas - TUa	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61428 - Chronic Toxicity, Pimephales promelas - TUc	-	-	-	-	-	-	-	2/Year	24hr Composite	Semi-annual
61941 - pH, Maximum - S.U.	9.0	-	-	-	-	-	-	1/Day	Continuous	All
61942 - pH, Minimum - S.U.	-	6.5	-	-	-	-	-	1/Day	Continuous	All
70300 - Residue, Total Filterable - mg/l	-	-	-	-	-	-	-	1 / 2 Weeks	24hr Composite	All
80082 - CBOD 5 day - mg/l	-	-	15	10	-	596	398	3/Week	24hr Composite	All

Notes for Station Number 2PD00011001:

* Effluent loadings based on average design flow of 10.5 MGD.

- a. Sampling at station 2PD00011001 and 2PD00011603 shall occur the same day.
- b. Total residual chlorine - See Part II, Item N.
- c. Mercury - See Part II, Item W.
- d. Dissolved Orthophosphate - See Part II, Item U.
- e. Toxicity Biomonitoring - See Part II, Item AA.
- f. Bis(2-ethylhexyl) phthalate - See Part II, Items N, V, and Y.
- g. Anthracene - See Part II, Item N.

PART I, B. CSO LIMITATIONS AND MONITORING REQUIREMENTS

1. CSO Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor at Station Number 2PD00011003, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - CSO Monitoring - 003 – Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
74062 - Overflow Occurrence - No./Month	-	-	-	-	-	-	-	When Disch.	Total	All
74063 - Overflow Volume - Million Gallons	-	-	-	-	-	-	-	When Disch.	24hr Total Estimate	All

Notes for Station Number 2PD00011003:

- Subject to the terms and conditions of this permit, including the General Effluent Limitations in Part III, Item 2, the permittee is authorized to discharge from this station only during wet weather periods when the flow in the sewer system exceeds the capacity of the sewer system.
- A Discharge Monitoring Report (DMR) for this station must be submitted every month. If this station is monitored during a particular month and there are no discharges during the entire month, select the "No Discharge" check box on the data entry form and PIN the eDMR.
- Data for Overflow Occurrence and Overflow Volume may be estimated if a measuring device is not available.
- Overflow Occurrences: If a discharge from this station occurs intermittently during a day, starting and stopping several times, count "1" occurrence for that day. If a discharge from this station occurs on more than one day but is the result of a continuing precipitation event, it should be counted as one occurrence. Report total occurrences for the month on Day 1 of the DMR.
- Overflow Volume shall be reported on each day there is a discharge through this station.
- Combined Sewer Overflows - See Part II, Items C, D, and E.

PART I, B. CSO LIMITATIONS AND MONITORING REQUIREMENTS

2. CSO Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor at Station Number 2PD00011004, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - CSO Monitoring - 004 – Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
74062 - Overflow Occurrence - No./Month	-	-	-	-	-	-	-	When Disch.	Total	All
74063 - Overflow Volume - Million Gallons	-	-	-	-	-	-	-	When Disch.	24hr Total Estimate	All

Notes for Station Number 2PD00011004:

- a. Subject to the terms and conditions of this permit, including the General Effluent Limitations in Part III, Item 2, the permittee is authorized to discharge from this station only during wet weather periods when the flow in the sewer system exceeds the capacity of the sewer system.
- b. A Discharge Monitoring Report (DMR) for this station must be submitted every month. If this station is monitored during a particular month and there are no discharges during the entire month, select the "No Discharge" check box on the data entry form and PIN the eDMR.
- c. Data for Overflow Occurrence and Overflow Volume may be estimated if a measuring device is not available.
- d. Overflow Occurrences: If a discharge from this station occurs intermittently during a day, starting and stopping several times, count "1" occurrence for that day. If a discharge from this station occurs on more than one day but is the result of a continuing precipitation event, it should be counted as one occurrence. Report total occurrences for the month on Day 1 of the DMR.
- e. Overflow Volume shall be reported on each day there is a discharge through this station.
- f. Combined Sewer Overflows - See Part II, Items C, D, and E.

PART I, B. CSO LIMITATIONS AND MONITORING REQUIREMENTS

3. CSO Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor at Station Number 2PD00011005, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - CSO Monitoring - 005 – Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
74062 - Overflow Occurrence - No./Month	-	-	-	-	-	-	-	When Disch.	Total	All
74063 - Overflow Volume - Million Gallons	-	-	-	-	-	-	-	When Disch.	24hr Total	All

Notes for Station Number 2PD00011005:

- Subject to the terms and conditions of this permit, including the General Effluent Limitations in Part III, Item 2, the permittee is authorized to discharge from this station only during wet weather periods when the flow in the sewer system exceeds the capacity of the sewer system.
- A Discharge Monitoring Report (DMR) for this station must be submitted every month. If this station is monitored during a particular month and there are no discharges during the entire month, select the "No Discharge" check box on the data entry form and PIN the eDMR.
- Data for Overflow Occurrence and Overflow Volume may be estimated if a measuring device is not available.
- Overflow Occurrences: If a discharge from this station occurs intermittently during a day, starting and stopping several times, count "1" occurrence for that day. If a discharge from this station occurs on more than one day but is the result of a continuing precipitation event, it should be counted as one occurrence. Report total occurrences for the month on Day 1 of the DMR.
- Overflow Volume shall be reported on each day there is a discharge through this station.
- Combined Sewer Overflows - See Part II, Items C, D, and E.

PART I, B. SSO LIMITATIONS AND MONITORING REQUIREMENTS

4. SSO Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor at Station Number 2PD00011300, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - SSO Monitoring - 300 – Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
74062 - Overflow Occurrence - No./Month	-	-	-	-	-	-	-	1/Month	Total	All

Notes for Station Number 2PD00011300:

a. A sanitary sewer overflow is an overflow, spill, release, or diversion of wastewater from a sanitary sewer system. Although the above table indicates that the Measuring Frequency for Overflow Occurrence is 1/Month, the intent of that provision is to specify a reporting frequency for Overflow Occurrence, not a monitoring frequency. The monitoring requirement under this permit is that these overflows shall be monitored on each day when they discharge. Only sanitary sewer overflows that enter waters of the state, either directly or through a storm sewer or other conveyance, must be reported under this monitoring station.

b. For the purpose of counting occurrences, each location on the sanitary sewer system where there is an overflow, spill, release, or diversion of wastewater on a given day that enters waters of the state is counted as one occurrence. For example, if on a given day overflows occur from a manhole at one location and from a damaged pipe at another location and they both enter waters of the state, record two occurrences for that day. If overflows from both locations continue on the following day, record two occurrences for the following day. At the end of the month, total the daily occurrences and report this number on Day 1 of the DMR. If there are no overflows during the entire month, report "zero" (0).

c. All sanitary sewer overflows are prohibited.

d. See Part II, Item G and H.

PART I, B. SLUDGE LIMITATIONS AND MONITORING REQUIREMENTS

5. Biosolids Monitoring - Class B Biosolids. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' final biosolids at Station Number 2PD00011581, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS.

Table - Sludge Monitoring - 581 – Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00611 - Ammonia (NH3) In Sludge - mg/kg	-	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
00627 - Nitrogen Kjeldahl, Total In Sludge - mg/kg	-	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
00668 - Phosphorus, Total In Sludge - mg/kg	-	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
00938 - Potassium In Sludge - mg/kg	-	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
01003 - Arsenic, Total In Sludge - mg/kg	75	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
01028 - Cadmium, Total In Sludge - mg/kg	85	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
01043 - Copper, Total In Sludge - mg/kg	4300	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
01052 - Lead, Total In Sludge - mg/kg	840	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
01068 - Nickel, Total In Sludge - mg/kg	420	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
01093 - Zinc, Total In Sludge - mg/kg	7500	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
01148 - Selenium, Total In Sludge - mg/kg	100	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
31641 - Fecal Coliform in Sludge - MPN/G	2000000	-	-	-	-	-	-	1/Quarter	Multiple Grab	Quarterly - Alt.
51129 - Sludge Fee Weight - dry tons	-	-	-	-	-	-	-	1/Quarter	Total	Quarterly - Alt.
70316 - Sludge Weight - Dry Tons	-	-	-	-	-	-	-	1/Quarter	Total	Quarterly - Alt.
71921 - Mercury, Total In Sludge - mg/kg	57	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.
78465 - Molybdenum In Sludge - mg/kg	75	-	-	-	-	-	-	1/Quarter	Composite	Quarterly - Alt.

Notes for Station Number 2PD00011581:

- a. Monitoring data shall be reported on the March, June, September, and December Discharge Monitoring Report (DMR). Monitoring shall be performed prior to biosolids being removed from the facility for beneficial use/land application. The monitoring data can be collected at any time during the reporting period. It is recommended that composite samples of the biosolids be collected at the end of the sewage sludge treatment process and analyzed close enough to the time of beneficial use to be reflective of the biosolids' current quality, but not so close that the results of the analysis are not available prior to land applying the biosolids.
- b. To sample for fecal coliform, the permittee should collect and analyze a grab sample over a two-week period for a total of seven grab samples when practical. Each of the grab samples shall be analyzed independently to determine the MPN/g of fecal coliform in the individual sample. The geometric mean of those seven results shall be reported on the DMR. Each fecal coliform sample shall be delivered to the analytical lab and analyzed within the holding time, in accordance with the requirements for Part 9221 E. or part 9222 D., "Standard Methods for the Examination of Water and Wastewater" or EPA Method 1680 or 1681 in 40 CFR Part 136. Analysis results shall be obtained prior to sewage sludge being removed from the treatment facility.
- c. For biosolids disposed of by hauling to an authorized landfill or transferred to another NPDES permit holder, metal and nutrient analysis is not required.
- d. For biosolids that will be beneficially used, metal and nutrient analysis shall be completed during each reporting period even when biosolids are not removed from the facility for beneficial use during that reporting period. Alternatively, the number of composite samples collected and reported prior to the next beneficial use event shall be increased to account for the reporting period(s) in which beneficial use did not occur. If metal and nutrient analysis has not been completed during each reporting period, when biosolids are removed from the facility for beneficial use, all metal and nutrient analysis results shall be reported on the applicable DMR by entering the separate results on different days within the DMR.
- e. If no biosolids are removed from the facility during the reporting period and no metal and nutrient analysis is completed during the reporting period, select the "No Discharge" check box on the data entry form and PIN the eDMR. If no biosolids are removed from the facility during the reporting period and metal and

nutrient analysis is completed during the reporting period enter the results for the metal and nutrient analysis on the DMR and report "0" for sludge weight and sludge fee weight.

f. Each day when sewage sludge is removed from the treatment works for use or disposal, a representative composite sample of sewage sludge shall be collected and analyzed for percent total solids. This value of percent total solids shall be used to calculate the total Sewage Sludge Weight (Discharge Monitoring Report code 70316) and/or total Sewage Sludge Fee Weight (Discharge Monitoring Report code 51129) removed from the treatment plant on that day. For reporting purposes, report the average value attained during the reporting period.

g. Units of mg/kg are on a dry weight basis.

h. Sludge weight is a calculated total for the year. To convert from gallons of liquid sewage sludge to dry tons of sewage sludge: $\text{dry tons} = \text{gallons} \times 8.34 \text{ (lb/gallon)} \times 0.0005 \text{ (tons/lb)} \times \text{decimal fraction total solids}$.

i. Sludge fee weight means sludge weight, in dry U.S. tons, excluding any admixtures such as liming material or bulking agents.

j. See Part II, Items Q, R, S, and T.

PART I, B. SLUDGE LIMITATIONS AND MONITORING REQUIREMENTS

6. Sludge Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' final sludge at Station Number 2PD00011586, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sludge sampling.

Table - Sludge Monitoring - 586 – Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
51129 - Sludge Fee Weight - dry tons	-	-	-	-	-	-	-	1/Year	Total	December

Notes for Station Number 2PD00011586:

a. Monitoring is required when sewage sludge is removed from the permittee's facility for disposal in a municipal solid waste landfill. The total Sludge Fee Weight of sewage sludge disposed of in a municipal solid waste landfill for the entire year shall be reported on the December Discharge Monitoring Report (DMR).

b. If no sewage sludge is removed from the permittee's facility for disposal in a municipal solid waste landfill during the year, select the "No Discharge" check box on the data entry form and PIN the eDMR.

c. Sludge fee weight means sludge weight, in dry U.S. tons, excluding any admixtures such as liming material or bulking agents.

d. Each day when sewage sludge is removed from the treatment works for disposal, a representative composite sample of sewage sludge shall be collected and analyzed for percent total solids. This value of percent total solids shall be used to calculate the total Sewage Sludge Fee Weight (Discharge Monitoring Report code 51129) removed from the treatment plant on that day.

e. Sludge weight is a calculated total for the year. To convert from gallons of liquid sewage sludge to dry tons of sewage sludge: dry tons = gallons x 8.34 (lb/gallon) x 0.0005 (tons/lb) x decimal fraction total solids.

f. See Part II, Items Q and R.

PART I, B. SLUDGE LIMITATIONS AND MONITORING REQUIREMENTS

7. Sludge Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' final sludge at Station Number 2PD00011588, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sludge sampling.

Table - Sludge Monitoring - 588 – Final

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
70316 - Sludge Weight - Dry Tons	-	-	-	-	-	-	-	1/Year	Total	Yearly

Notes for Station Number 2PD00011588:

- Monitoring is required when sewage sludge is removed from the permittee's facility for transfer to another NPDES permit holder. The total sludge weight transferred to another NPDES permit holder for the entire year shall be reported on the December Discharge Monitoring Report (DMR).
- If no sewage sludge is removed from the permittee's facility for transfer to another NPDES permit holder during the year, select the "No Discharge" check box on the data entry form and PIN the DMR.
- Sludge weight is a calculated total for the year. To convert from gallons of liquid sewage sludge to dry tons of sewage sludge: dry tons = gallons x 8.34 (lb/gallon) x 0.0005 (tons/lb) x decimal fraction total solids.
- Each day when sewage sludge is removed from the treatment works for disposal, a representative composite sample of sewage sludge shall be collected and analyzed for percent total solids. This value of percent total solids shall be used to calculate the total Sewage Sludge Weight (Discharge Monitoring Report code 70316) removed from the treatment plant on that day.
- See Part II, Items Q and R.

PART I, B. INFLUENT MONITORING REQUIREMENTS

8. Influent Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment works' influent wastewater at Station Number 2PD00011601, and report to the Ohio EPA in accordance with the following table. Samples of influent used for determination of net values or percent removal must be taken the same day as those samples of effluent used for that determination. See Part II, OTHER REQUIREMENTS, for location of influent sampling.

Table - Influent Monitoring - 601 – Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	3/Week	24hr Composite	All
00720 - Cyanide, Total - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
01074 - Nickel, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01079 - Silver, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01094 - Zinc, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01113 - Cadmium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01114 - Lead, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01118 - Chromium, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01119 - Copper, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All
01220 - Chromium, Dissolved Hexavalent - ug/l	-	-	-	-	-	-	-	1/Month	Grab	All
39100 - Bis(2-ethylhexyl) Phthalate - ug/l	-	-	-	-	-	-	-	1/Month	24hr Composite	All

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
50092 - Mercury, Total (Low Level) - ng/l	-	-	-	-	-	-	-	1/Month	Grab	All
61941 - pH, Maximum - S.U.	-	-	-	-	-	-	-	1/Day	Continuous	All
61942 - pH, Minimum - S.U.	-	-	-	-	-	-	-	1/Day	Continuous	All
80082 - CBOD 5 day - mg/l	-	-	-	-	-	-	-	3/Week	24hr Composite	All

Notes for Station Number 2PD00011601:

- a. Sampling for common/respective parameters shall be collected on the same day as 2PD00011001.
- b. Bis(2-ethylhexyl) phthalate and silver - See Part II, Item Y.
- c. Mercury - See Part II, Item W.

PART I, B. BYPASS LIMITATIONS AND MONITORING REQUIREMENTS

9. Bypass Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the treatment plant's bypass when discharging, at Station Number 2PD00011603, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - Bypass Monitoring - 603 – Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00051 - Bypass Occurrence - No./Day	-	-	-	-	-	-	-	When Disch.	Total	All
00052 - Bypass Total Hours Per Day - Hrs/Day	-	-	-	-	-	-	-	When Disch.	Total	All
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	1/Day	Grab	All
51428 - Bypass Volume - MGAL	-	-	-	-	-	-	-	When Disch.	24hr Total	All
80082 - CBOD 5 day - mg/l	-	-	-	-	-	-	-	1/Day	Grab	All

Notes for Station Number 2PD00011603:

- Discharges through this station are approved as a CSO-related bypass under certain conditions. See Part II, Item F.
- Data for bypass occurrence, bypass duration, and bypass volume may be estimated if a measuring device is not available.
- A Discharge Monitoring Report (DMR) for this station must be submitted every month. If there are no discharges during the entire month, select the "No Discharge" check box on the data entry form and PIN the eDMR.
- Monitoring and sampling shall be conducted and reported on each day that there is a discharge through this station.
- Bypass Occurrence: If a discharge from this station occurs intermittently during a day, starting and stopping several times, report "1" for that day. If a discharge from this station occurs on more than one day but is the result of a continuing precipitation event, it should be counted as one occurrence: Report "1" on the first day of the discharge.
- Discharge through this station under any condition except those specified in Part II, Item F is prohibited. The Director may take enforcement action for violations of this prohibition unless the three conditions specified at 40 CFR 122.41(m) and in Part III, Item 11.C.1 of this permit are met.

PART I, B. UPSTREAM MONITORING REQUIREMENTS

10. Upstream Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the receiving stream, upstream of the point of discharge at Station Number 2PD00011801, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - Upstream Monitoring - 801 – Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00625 - Nitrogen Kjeldahl, Total - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00630 - Nitrite Plus Nitrate, Total - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00665 - Phosphorus, Total (P) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
31648 - E. coli - #/100 ml	-	-	-	-	-	-	-	1 / 2 Weeks	Grab	June - Aug
61432 - 48-Hr. Acute Toxicity Ceriodaphnia dubia - % Affected	-	-	-	-	-	-	-	2/Year	Grab	Semi-annual
61435 - 96-Hr. Acute Toxicity Pimephales promela - % Affected	-	-	-	-	-	-	-	2/Year	Grab	Semi-annual
61438 - 7-Day Chronic Toxicity Ceriodaphnia dubia - % Affected	-	-	-	-	-	-	-	2/Year	Grab	Semi-annual
61441 - 7-Day Chronic Toxicity Pimephales promelas - % Affected	-	-	-	-	-	-	-	2/Year	Grab	Semi-annual

Notes for Station Number 2PF00011801:

- a. Sampling for the respective/common parameters shall occur on the same day as Outfall 2PD00011001.
- b. Toxicity Biomonitoring - See Part II, Item AA.

Part I, B. DOWNSTREAM-NEARFIELD MONITORING REQUIREMENTS

11. Downstream-Nearfield Monitoring. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the receiving stream, downstream of the point of discharge, at Station Number 2PD00011901, and report to the Ohio EPA in accordance with the following table. See Part II, OTHER REQUIREMENTS, for location of sampling.

Table - Downstream-Nearfield Monitoring - 901 – Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Month	Grab	All
00400 - pH - S.U.	-	-	-	-	-	-	-	1/Month	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00625 - Nitrogen Kjeldahl, Total - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00630 - Nitrite Plus Nitrate, Total - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00665 - Phosphorus, Total (P) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00900 - Hardness, Total (CaCO3) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
31648 - E. coli - #/100 ml	-	-	-	-	-	-	-	1 / 2 Weeks	Grab	June - Aug

Notes for Station Number 2PD00011901:

- a. Sampling for the respective/common parameters shall occur on the same day as Outfall 2PD00011001.

PART I, C. - SCHEDULE OF COMPLIANCE

<u>Milestone Summary Report</u>			
<u>Section</u>	<u>Report</u>	<u>Event Code</u>	<u>Due Date</u>
CSO Compliance Schedule	Status Report	95999	September 1, 2025
CSO Compliance Schedule	Begin Construction	3099	December 31, 2025
CSO Compliance Schedule	End Construction	4599	September 1, 2026
CSO Compliance Schedule	Status Report	95999	December 31, 2026
CSO Compliance Schedule	End Construction	4599	December 31, 2027
CSO Compliance Schedule	Status Report	95999	December 31, 2027
CSO Compliance Schedule	Status Report	95999	December 31, 2028
Municipal Pretreatment Schedule	Eff Limits For Pollutants	52599	6 months after the permit effective date
New Effluent Limit Schedule	Submit First Annual Report	90199	12 months after the permit effective date
New Effluent Limit Schedule	Submit Second Report	90299	24 months after the permit effective date
New Effluent Limit Schedule	Final Compliance w/ Eff Limits	5699	36 months after the permit effective date

1. Municipal Pretreatment Schedule

a. The permittee shall evaluate the adequacy of local industrial user limitations to prevent the introduction of pollutants into the POTW which will interfere with the operation of the POTW, pass through the POTW in amounts that exceed water quality standard-based limits, be incompatible with the POTW, or limit wastewater or sludge use options. Technical justification for revising local industrial user limitations to attain compliance with final table limits, along with a pretreatment program modification request, or technical justification for retaining existing local industrial user limitations shall be submitted for acceptance to Ohio EPA, Central Office Pretreatment Unit and to Ohio EPA, Northwest District Office, as soon as possible, but no later than 6 months after the permit effective date. (Event Code 52599)

Technical justification is required for arsenic, bis (2-ethylhexyl) phthalate, cadmium, total chromium, dissolved hexavalent chromium, copper, free cyanide, lead, mercury, molybdenum, nickel, selenium, silver, and zinc unless screening of wastewater and sludge indicate these pollutants are not present in significant amounts. Technical justification is also required for any other pollutants where a local limit may be necessary to protect against pass through, interference or sludge disposal.

To demonstrate technical justification for new local industrial user limits or justification for retaining existing limits, a local limits technical justification report shall be submitted to Ohio EPA. The report shall be consistent with the guidance, procedures and methodologies found in Ohio EPA's and USEPA's local limits guidance documents available at:

<https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/pretreatment-program>

The report shall include the following:

- i. Identification of and justification for pollutants of concern for which local limits will be developed.
 - ii. Treatment plant flow and industrial flows to which local limits will be applied. If the POTW is accepting any hauled waste include for each type of hauled waste (e.g. landfill leachate, septage), at least 5 data points detailing the dates and volumes of discharge and sampling results for all the pollutants of concern.
 - iii. Domestic/background concentrations. To determine domestic/background concentrations, the permittee shall, at a minimum, sample at three different locations for five consecutive days or two different locations for seven consecutive days. These locations shall, to the extent possible, convey only domestic wastewater.
 - iv. Treatment plant removal efficiencies. Whenever possible, site specific removal efficiencies shall be determined using actual plant data with analytical detection levels that are sensitive enough to provide values above the reporting level (RL) or practical quantification limit (PQL).
 - v. A comparison of maximum allowable headworks loadings based on all applicable criteria. Criteria may include sludge disposal, NPDES permit limits, waste load allocation values, and interference with biological processes such as activated sludge, sludge digestion, nitrification, etc. Calculation tables can be found on the Ohio EPA website at:
<https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/pretreatment-program>
 - vi. If revised industrial user discharge limits are proposed, the method of allocating available pollutant loads to industrial users.
 - vii. If narrative or best management practices (BMPs) are proposed as local limits, information on how they will be implemented. When appropriate, industrial user discharge limits may include narrative local limits requiring industrial users to develop and implement BMPs. These narrative local limits may be used either alone or as a supplement to numeric limits.
 - viii. Supporting data, assumptions, and methodologies used in establishing the information in item 1.a through 1.g above.
 - ix. If new or revised industrial user discharge limits are proposed, the stamp and signature of a licensed Ohio professional engineer.
- b. Revisions. The permittee shall submit a revised local limit technical justification report within 90 days of receiving notification from Ohio EPA of deficiencies in the submitted report.
- c. If revisions to local industrial user limitations including best management practices are determined to be necessary, the permittee shall incorporate revised local industrial user limitations in all industrial user control documents, as applicable, no later than 4 months after the date of Ohio EPA's approval.
- d. Sampling Methods
- i. Mercury: If the permittee uses EPA Method 245.1 or 245.2 to sample domestic background locations and mercury concentrations are below detection, the permittee shall use EPA method 1631 or 245.7 to quantify domestic background contributions of mercury.

ii. Free Cyanide: The permittee shall use ASTM D7237, OIA-1677-09, or ASTM D4282-02 to quantify domestic background contributions of free cyanide. [Note: The use of ASTM D4282-02 requires supporting documentation that it meets the requirement of a "sufficiently sensitive" test procedure as defined in 40 CFR 122.44(i)(1)(iv)].

2. Long Term Control Plan Schedule

The City of Marion Combined Sewer Long Term Control Plan Update (LTCP) was approved on March 16, 2020. The LTCP proposes to control CSO 003 and CSO 004 to eight (8) and nine (9) events per typical year, respectively, zero untreated bypasses at Marion WPCP, and elimination of sanitary sewer overflows (SSOs). This level of control is proposed to be attained through completion of various construction projects and completed by December 31, 2044. The permittee shall implement the approved LTCP projects as soon as practicable but not later than the dates in the following schedule:

a. Phase 2

- i. No later than September 1, 2025, the permittee shall submit to Ohio EPA NWDO a progress report on the Design and Construction for the Columbia-Fies EQ Basin. (Event Code 95999)
- ii. As soon as possible but no later than September 1, 2026, the permittee shall complete construction of the Columbia-Fies EQ basin. (Event Code 4599)

b. Phase 3

- i. No later than December 31, 2025 the permittee shall initiate design and construction of the Holland Silver EQ basin. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of the phase initiation. (Event Code 3099)
- ii. No later than December 31, 2026, the permittee shall submit to Ohio EPA NWDO a progress report on the Design and Construction for the Holland-Silver EQ Basin. (Event Code 95999)
- iii. As soon as possible but no later than December 31, 2027, the permittee shall complete construction of the Holland-Silver EQ basin. (Event Code 4599)

c. Phase 3 Project Assessment

- i. Upon completion of Phase 3 construction but no later than December 31, 2027 the permittee shall initiate a Project Assessment for Phase 3. During the Project Assessment, the permittee shall monitor the collection system and treatment facility and assess the impact of the completed Phase 3 project on wet weather discharges. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of assessment initiation. (Event Code 95999)
- ii. No later than December 31, 2028, the permittee shall submit to Ohio EPA NWDO a progress report on the Phase 3 Project Assessment. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs). (Event Code 95999)
- iii. As soon as possible but no later than December 31, 2029, the permittee shall conclude the Phase 3 Project Assessment and submit a report on the results of the assessment period to Ohio EPA NWDO. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up

events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs). If the permittee determines that a revision to the approved LTCP schedule is necessary, appropriate justification shall be provided.

d. Phase 4

i. No later than December 31, 2029, the permittee shall initiate design and construction of Phase 4 of the LTCP. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of the phase's initiation.

ii. No later than December 31, 2030, the permittee shall submit to Ohio EPA NWDO a progress report on the Design and Construction for Phase 4 of the LTCP.

iii. As soon as possible but no later than December 30, 2031, the permittee shall complete construction of the various projects associated with Phase 4 of the LTCP.

e. Phase 4 Project Assessment

i. Upon completion of Phase 4 construction but no later than December 31, 2031, the permittee shall initiate a Project Assessment for Phase 4. During the Project Assessment, the permittee shall monitor the collection system and treatment facility and assess the impact of the completed Phase 4 project on wet weather discharges. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of assessment initiation.

ii. As soon as possible but no later than December 31, 2032, the permittee shall conclude the Phase 4 Project Assessment and submit a report on the results of the assessment period to Ohio EPA NWDO. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs). If the permittee determines that a revision to the approved LTCP schedule is necessary, appropriate justification shall be provided.

f. Phase 5

i. No later than December 31, 2032, the permittee shall initiate design and construction of Phase 5 of the LTCP. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of the phase's initiation.

ii. No later than December 31, 2033, the permittee shall submit to Ohio EPA NWDO a progress report on the Design and Construction for Phase 5 of the LTCP.

iii. As soon as possible but no later than December 30, 2034, the permittee shall complete construction of the various projects associated with Phase 5 of the LTCP.

g. Phase 5 Project Assessment

i. Upon completion of Phase 5 construction but no later than December 31, 2034, the permittee shall initiate a Project Assessment for Phase 5. During the Project Assessment, the permittee shall monitor the collection system and treatment facility and assess the impact of the completed Phase 5 project on wet weather discharges. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of assessment initiation.

ii. As soon as possible but no later than December 31, 2035, the permittee shall conclude the Phase 5 Project Assessment and submit a report on the results of the assessment period to Ohio EPA NWDO. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs). If the permittee determines that a revision to the approved LTCP schedule is necessary, appropriate justification shall be provided.

h. Phase 6

i. No later than December 31, 2035, the permittee shall initiate design and construction of Phase 6 of the LTCP. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of the phase's initiation.

ii. No later than December 31, 2036, the permittee shall submit to Ohio EPA NWDO a progress report on the Design and Construction for Phase 6 of the LTCP.

iii. As soon as possible but no later than December 30, 2037, the permittee shall complete construction of the various projects associated with Phase 6 of the LTCP.

i. Phase 6 Project Assessment

i. Upon completion of Phase 6 construction but no later than December 31, 2037, the permittee shall initiate a Project Assessment for Phase 6. During the Project Assessment, the permittee shall monitor the collection system and treatment facility and assess the impact of the completed Phase 6 project on wet weather discharges. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of assessment initiation.

ii. No later than December 31, 2038, the permittee shall submit to Ohio EPA NWDO a progress report on the Phase 6 Project Assessment. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs).

iii. As soon as possible but no later than December 31, 2039, the permittee shall conclude the Phase 6 Project Assessment and submit a report on the results of the assessment period to Ohio EPA NWDO. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs). If the permittee determines that a revision to the approved LTCP schedule is necessary, appropriate justification shall be provided.

j. Phase 7

i. No later than December 31, 2039, the permittee shall initiate design and construction of Indiana Ave., Mt. Vernon Ave., and Uncapher Ave. Storm Sewer Diversions. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of the phase's initiation.

ii. No later than December 31, 2040, the permittee shall submit to Ohio EPA NWDO a progress report on the Design and Construction for the Indiana Ave., Mt. Vernon Ave., and Uncapher Ave. Storm Sewer

Diversions.

iii. As soon as possible but no later than December 30, 2041, the permittee shall complete construction of the Indiana Ave., Mt. Vernon Ave., and Uncapher Ave. Storm Sewer Diversions.

k. Phase 7 Project Assessment

i. Upon completion of Phase 7 construction but no later than December 31, 2041, the permittee shall initiate a Project Assessment for Phase 7. During the Project Assessment, the permittee shall monitor the collection system and treatment facility and assess the impact of the completed Phase 7 project on wet weather discharges. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of assessment initiation.

ii. No later than December 31, 2042, the permittee shall submit to Ohio EPA NWDO a progress report on the Phase 7 Project Assessment. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs).

iii. As soon as possible but no later than December 31, 2043, the permittee shall conclude the Phase 7 Project Assessment and submit a report on the results of the assessment period to Ohio EPA NWDO. At a minimum, the report shall include data characterizing wet weather overflow and basement back-up events during the previous twelve months and a description of planned and/or implemented projects that are not included in the LTCP (such as inflow/infiltration remediation or emergency repairs). If the permittee determines that a revision to the approved LTCP schedule is necessary, appropriate justification shall be provided.

l. Final Program Assessment.

i. Upon completion of the LTCP but no later than December 31, 2043, the permittee shall initiate the Final Program Assessment. During the Program Assessment, the permittee shall monitor the collection system and treatment facility and assess the impact of the completed LTCP project on wet weather discharges. The permittee shall notify Ohio EPA Northwest District Office (NWDO) within 7 days of assessment initiation.

ii. As soon as possible but no later than December 31, 2044, the permittee shall conclude the Final Program Assessment and submit a report on the results of the assessment period to Ohio EPA NWDO.

14. This Schedule of Compliance includes items that extend beyond the expiration date of this NPDES permit modification, 2PD00011*SD. The Schedule of Compliance requirements will be included in permit number 2PD00011 when it is renewed.

New Effluent Limit Schedule

3. New Final Effluent Limits for Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate.

The permittee shall attain compliance with the new final effluent limits for Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate as soon as possible but not later than the dates in the following schedule:

a. No later than 12 months after the permit effective date, the permittee shall submit to Ohio EPA Northwest District Office a report on the progress toward attaining compliance with the final effluent

limits for Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate.. At a minimum, the report shall include influent and effluent data from the previous twelve months and a summary of all activities completed to reduce Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate loading. (Event Code 90199)

b. No later than 24 months after the permit effective date , the permittee shall submit to Ohio EPA Northwest District Office a report on the progress toward attaining compliance with the final effluent limits for Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate. At a minimum, the report shall include influent and effluent data from the previous twelve months and a summary of all activities completed to reduce Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate loading. (Event Code 90299)

c. No later than 36 months after the permit effective date , the permittee shall attain compliance with the final effluent limits for Total Recoverable Silver, Dibenzo (A,H) Anthracene, and Bis(2-ethylhexyl) Phthalate. The permittee shall notify Ohio EPA NWDO District Office within 14 days of attaining compliance. (Event Code 05699)

PART II - OTHER REQUIREMENTS

A. Operator Certification Requirements

1. Classification

a. In accordance with Ohio Administrative Code 3745-7-04, the sewage treatment facility shall be classified as a Class IV treatment works. The permittee shall designate one or more professional operator of record to oversee the technical operation of the treatment works with a valid certification of a class equal to or greater than the classification of the treatment works.

b. All sewerage (collection) systems that are tributary to this treatment works are Class II sewerage systems in accordance with paragraph (B)(1)(b) of rule 3745-7-04 of the Ohio Administrative Code. The permittee shall designate one or more professional operator of record to oversee the technical operation of the sewerage (collection) system with a valid certification of a class equal to or greater than the classification of the sewerage (collection) system.

2. Professional Operator of Record

a. Within three days of a change in a professional operator of record, the permittee shall notify the Director of the Ohio EPA of any such change on a form acceptable to Ohio EPA. The notification can be submitted either electronically via the Ohio eBusiness Center website (<https://ebiz.epa.ohio.gov/login.html>) or hard copy. The appropriate form can be found at the following website:

<https://epa.ohio.gov/static/Portals/28/documents/opcert/Operator%20of%20Record%20Notification%20Form.pdf?ver=2018-09-11-102530-423>

b. All applications for renewal of this NPDES permit shall include an updated Operator of Record Notification form along with other necessary forms and fees to be considered a complete application.

c. The professional operator of record for a class II, III, or IV treatment works or class II sewerage system may be replaced by a backup professional operator with a certificate one classification lower than the treatment works or sewerage system for a period of up to thirty consecutive days. The use of this provision does not require notification to the agency. This provision may not be used to routinely circumvent minimum staffing requirements.

d. Upon proper justification, such as military leave or long term illness, the director may authorize the replacement of the professional operator of record for a class II, III, or IV treatment works or class II sewerage system by a backup professional operator with a certificate one classification lower than the facility for a period of greater than thirty consecutive days. Such requests shall be made in writing to the appropriate district office.

3. Minimum Staffing Requirements

a. The permittee shall ensure that the treatment works professional operator of record is physically present at the facility in accordance with the minimum staffing requirements per paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code or the requirements from an approved 3745-7-04(C) minimum staffing hour reduction plan.

b. The permittee shall ensure that the collection system professional operator of record or a professional operator that is certified in the field of wastewater collection or wastewater treatment, class A operators

excluded, is physically present at the collection system in accordance with the minimum staffing requirements per paragraph (C)(2) of rule 3745-7-04 of the Ohio Administrative Code.

c. If Ohio EPA approves a reduction in minimum staffing requirements based upon a facility operating plan, any change in the criteria under which the operating plan was approved (e.g., retirement of a professional operator listed in the approved staffing plan, loss of the professional operator of record, reduction in the workforce, removal or failure of automation or continuous monitoring, etc.) will require that the treatment works immediately return to the minimum staffing requirements included in paragraph (C)(1) of rule 3745-7-04 of the Ohio Administrative Code.

4. Additional Staffing Requirements

Visits to all treatment works shall be performed by the permittee, the permittee's representative, or agent five days a week and noted in the operational and maintenance records required by rule 3745-7-09 of the Administrative Code. Visits shall not be necessary when the treatment works is not in operation.

B. Description of the location of the required sampling stations are as follows:

Sampling Station	Description of Location
2PD00011001	Final effluent - all sampling to be after chlorine contact tank (Lat: 40N 35' 23"; Long: 83W 11' 02")
2PD00011300	System-wide sanitary sewer overflow occurrences
2PD00011581	Beneficial use of Class B biosolids
2PD00011586	Disposal of sewage sludge or biosolids in an authorized landfill
2PD00011588	Transfer of sewage sludge or biosolids to another NPDES permittee
2PD00011601	Influent monitoring
2PD00011603	Internal bypass - after primary treatment directly next to chlorine contact tank
2PD00011801	Upstream monitoring
2PD00011901	Downstream monitoring

C. The permittee is authorized to discharge from the following combined sewer overflows (CSOs) only during wet weather periods when the flow in the sewer system exceeds the capacity of the sewer system. See Part I,B for applicable monitoring and reporting requirements. Also see Part III, Item 11.

CSO Station	Description of Location, Receiving Stream
2PD00011003	CSO outfall at Silver Street/Holland Road to Rock Swale (Lat: 40N 10' 35"; Long: 83W 11' 02")
2PD00011004	CSO outfall at Columbia Street/Fries Avenue to Columbia Street Ditch (Lat: 40N 34' 51"; Long: 83W 08' 57")
2PD00011005	CSO outfall at Mount Vernon Avenue to QUQUA Ditch (Lat: 40N 34' 35"; Long: 83W 06' 27")

D. CSO Permit Reopener

This permit may be modified or revoked and reissued, as provided pursuant to 40 CFR 122.62 and 124.5 and rule 3745-33-04 of the Ohio Administrative Code, for the following reasons:

- a. To include new or revised conditions developed to comply with any State or Federal law or regulation that addresses combined sewer overflows or sanitary sewer overflows that is adopted or promulgated after the effective date of this permit.
- b. To include new or revised conditions if new information, not available at the time of permit issuance, indicates that combined sewer overflows (CSO) controls imposed under the permit have failed to ensure the attainment of State water quality standards.
- c. To include new or revised conditions based on new information generated from development and implementation of the permittee's Long Term Control Plan (LTCP). In addition, the permit may be modified or revoked and reissued for any reason specified in 40 CFR 122.62 and rule 3745-33-04 of the Ohio Administrative Code.

E. CSO Nine Minimum Controls

The entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. To accomplish this, the permittee shall utilize the following technologies:

- 1) provide proper operation and maintenance for the collection system and the CSOs;
- 2) provide the maximum use of the collection system for storage of wet weather flow prior to allowing CSOs;
- 3) review and modify the pretreatment program to minimize the impact of nondomestic discharges from CSOs;
- 4) maximize the capabilities of the POTW to treat wet weather flows, and maximize the wet weather flow to the wastewater treatment plant within the limits of the plant's capabilities;
- 5) prohibit dry weather overflows;
- 6) control solid and floatable materials in the CSO discharge;
- 7) conduct required inspection, monitoring and reporting of CSOs;
- 8) implement pollution prevention programs that focus on reducing the level of contaminants in CSOs;
- 9) implement a public notification program for areas affected by CSOs, especially beaches and recreation areas.

F. The average daily designed flow of the facility's secondary treatment processes is 10.5 MGD, with a peak hydraulic capacity of 42 MGD, as well as a 5.0-million gallon equalization basin. The facility also has excess capacity in the primary and disinfection treatment units which provides an additional 9 MGD of partial treatment capacity for a total peak flow capacity of 51 MGD. The wastewater treatment plant shall always be operated to maximize the treatment of wet weather flows through secondary treatment.

A CSO-related bypass of the secondary treatment system, monitored at Bypass Station 2PD00011603, is approved when the flow rate to the treatment plant exceeds 42 MGD and the equalization basin is full, as a result of a precipitation event. Bypasses that occur when the flow rate at the time of the bypass is under the specified flow rate are not approved under this condition and are subject to the bypass provision at 40 CFR 122.41(m). In the event of a CSO-related bypass approved under this condition, the permittee shall minimize the discharge of pollutants to the environment. At a minimum, CSO-related bypass flows must receive solids & floatables removal and primary clarification, as well as disinfection (in summer).

The permittee shall report to Ohio EPA Northwest District Office any substantial changes in the volume or character of pollutants being introduced into the POTW. Approval of CSO-related bypasses under this provision may be modified or terminated when there is a substantial change in the volume or character of pollutants being introduced to the POTW. The permittee shall provide notice to the permitting authority of bypasses approved under this provision within 24 hours of occurrence of the bypass.

G. Sanitary Sewer Overflow (SSO) Reporting Requirements

A sanitary sewer overflow is an overflow, spill, release, or diversion of wastewater from a sanitary sewer system. SSOs do not include wet weather discharges from combined sewer overflows specifically listed in Part II of this NPDES permit (if any). All SSOs are prohibited.

1. Reporting for SSOs That Imminently and Substantially Endanger Human Health

a) Immediate Notification

You must notify Ohio EPA (1-800-282-9378) and the appropriate Board of Health (i.e., city or county) within 24 hours of learning of any SSO from your sewers or from your maintenance contract areas that may imminently and substantially endanger human health. The telephone report must identify the location, estimated volume and receiving water, if any, of the overflow. An SSO that may imminently and substantially endanger human health includes dry weather overflows, major line breaks, overflow events that result in fish kills or other significant harm, overflows that expose the general public to contact with raw sewage, and overflow events that occur in sensitive waters and high exposure areas such as protection areas for public drinking water intakes and waters where primary contact recreation occurs.

b) Follow-Up Written Report

Within 5 days of the time you become aware of any SSO that may imminently and substantially endanger human health, you must provide the appropriate Ohio EPA district office a written report that includes:

- (i) the estimated date and time when the overflow began and stopped or will be stopped (if known);
- (ii) the location of the SSO including an identification number or designation if one exists;
- (iii) the receiving water (if there is one);
- (iv) an estimate of the volume of the SSO (if known);
- (v) a description of the sewer system component from which the release occurred (e.g., manhole, constructed overflow pipe, crack in pipe);
- (vi) the cause or suspected cause of the overflow;
- (vii) steps taken or planned to reduce, eliminate, and prevent reoccurrence of the overflow and a schedule of major milestones for those steps; and
- (viii) steps taken or planned to mitigate the impact(s) of the overflow and a schedule of major milestones for those steps.

An acceptable 5-day follow-up written report can be filled-in or downloaded from the Ohio EPA Division of Surface Water Permits Program Technical Assistance Web page at:

<https://epa.ohio.gov/divisions-and-offices/surface-water/guides-manuals/permits-program-technical-assistance>

2. Reporting for All SSOs, Including Those That Imminently and Substantially Endanger Human Health

a) Discharge Monitoring Reports (DMR)

Sanitary sewer overflows that enter waters of the state, either directly or through a storm sewer or other

conveyance, shall be reported on your Discharge Monitoring Reports (DMR). You must report the system-wide number of occurrences for SSOs that enter waters of the state in accordance with the requirements for station number 300. A monitoring table for this station is included in Part I, B of this NPDES permit. For the purpose of counting occurrences, each location on the sanitary sewer system where there is an overflow, spill, release, or diversion of wastewater on a given day is counted as one occurrence. For example, if on a given day overflows occur from a manhole at one location and from a damaged pipe at another location and they both enter waters of the state, you should record two occurrences for that day. If overflows from both locations continue on the following day, you should record two occurrences for the following day. At the end of the month, total the daily occurrences from all locations on your system and report this number using reporting code 74062 (Overflow Occurrence, No./Month) on your eDMR for station number 300.

b) Annual Report

You must prepare an annual report of all SSOs in your collection system, including those that do not enter waters of the state. The annual report must be in an acceptable format (see below) and must include:

- (i) A table that lists an identification number, a location description, and the receiving water (if any) for each existing SSO. If an SSO previously included in the list has been eliminated, this shall be noted. Assign each SSO location a unique identification by numbering them consecutively, beginning with 301.
- (ii) A table that lists the date that an overflow occurred, the unique ID of the overflow, the name of affected receiving waters (if any), and the estimated volume of the overflow (in millions of gallons). The annual report may summarize information regarding overflows of less than approximately 1,000 gallons.
- (iii) A table that summarizes the occurrence of water in basements (WIBs) by total number and by sewershed. The report shall include a narrative analysis of WIB patterns by location, frequency and cause. Only WIBs caused by a problem in the publicly-owned collection system must be included.

Not later than March 31 of each year, you must submit one copy of the annual report for the previous calendar year. The report may be submitted electronically using the NPDES Annual Sanitary Sewer Overflow Report available through the Ohio EPA eBusiness Center, Division of Surface Water NPDES Permit Applications service. Alternatively, you may submit one hardcopy of the report to Ohio EPA Northwest District Office and one copy to: Ohio EPA; Division of Surface Water; NPDES Permit Unit; P.O. Box 1049; Columbus, OH, 43216-1049. An acceptable annual SSO report can be filled-in or downloaded from the Ohio EPA Division of Surface Water Permits Program Technical Assistance Web page at: <https://epa.ohio.gov/divisions-and-offices/surface-water/guides-manuals/permits-program-technical-assistance>

You also must provide adequate notice to the public of the availability of the report. Adequate public notice would include: notices posted at the community administration building, the public library and the post office; a public notice in the newspaper; or a notice sent out with all sewer bills.

H. The permittee shall maintain in good working order and operate as efficiently as possible the "treatment works" and "sewerage system" as defined in ORC 6111.01 to achieve compliance with the terms and conditions of this permit and to prevent discharges to the waters of the state, surface of the ground, basements, homes, buildings, etc.

I. All parameters, except flow, need not be monitored on days when the plant is not normally staffed (Saturdays, Sundays, and Holidays). On those days, report "AN" on the monthly report form.

J. Composite samples shall be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the sewage flow rate at the time of sampling. Such samples shall be collected at such times and locations, and in such a fashion, as to be representative of the facility's overall performance.

K. Grab samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's performance.

L. Multiple grab samples shall be comprised of at least three grab samples collected at intervals of at least three hours during the period that the plant is staffed on each day for sampling. Samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's overall performance. The critical value shall be reported.

M. The treatment works must obtain at least 85 percent removal of carbonaceous biochemical oxygen demand (five-day) and suspended solids (see Part III, Item 1).

N. Limits Below Quantification

The parameters below have had effluent limitations established that are below the Ohio EPA Quantification Level (QL) for the approved analytical procedure promulgated at 40 CFR Part 136. QLs may be expressed as Practical Quantification Levels (PQL) or Minimum Level (ML). Compliance with an effluent limit that is below the QL is determined in accordance with ORC Section 6111.13 and OAC 3745-33-07(C). For maximum effluent limits, any value reported below the QL shall be considered in compliance with the effluent limit. For average effluent limits, compliance shall be determined by taking the arithmetic mean of values reported for a specified averaging period, using zero (0) for any value reported at a concentration less than the QL, and comparing that mean to the appropriate average effluent limit. An arithmetic mean that is less than or equal to the average effluent limit shall be considered in compliance with that limit. The permittee must utilize the lowest available detection method currently approved under 40 CFR Part 136 for monitoring these parameters.

Reporting:

All analytical results, even those below the QL, shall be reported. Analytical results are to be reported as follows:

1. Results above the QL: report the analytical result for the parameter of concern.
2. Results above the method detection limit (MDL) but below the QL: report the analytical result, even though it is below the QL.
3. Results below the MDL: report the analytical result as "below detection" using the code "AA".

The following table of QLs will be used to determine compliance with final effluent limits:

Parameter	PQL
Chlorine, Total Residual	0.050 mg/L
Bis(2-ethylhexyl)phthalate	2.5 ug/L
Dibenz(a,h)anthracene	0.015 ug/L

This permit may be modified, or revoked and reissued, to include more stringent effluent limits or

conditions if information generated as a result of the conditions of this permit indicate the presence of these pollutants in the discharge at levels above the water quality based effluent limits (WQBELs).

O. Sampling for these parameters at station 2PD00011001, 2PD0001601, and 2PD00011901 shall occur the same day.

P. Water quality-based effluent limits (WQBELs) in this permit may be revised based on updated wasteload allocations or use designation rules. This permit may be modified, or revoked and reissued, to include new WQBELs or other conditions that are necessary to comply with a revised wasteload allocation or approved Total Maximum Daily Load (TMDL) report, as required under Section 303(d) of the Clean Water Act.

Q. All treatment, storage, transfer, or disposal of sewage sludge or biosolids or beneficial use of biosolids by the Permittee shall comply with Chapter 6111. of the Ohio Revised Code, Chapter 3745-40 of the Ohio Administrative Code (OAC), any further requirements specified in this NPDES permit, and any other actions of the Director that pertain to the treatment, storage, transfer, or disposal of sewage sludge and biosolids and the beneficial use of biosolids by the Permittee.

R. No later than March 1 of each calendar year, the Permittee shall submit an annual sludge report summarizing the sewage sludge disposal, use, storage, or treatment activities of the Permittee during the previous calendar year. The report shall be submitted through the Ohio EPA eBusiness Center, Division of Surface Water NPDES Permit Applications service

S. The permittee shall maintain standard operating procedures for how pathogen reduction and vector attraction reduction are achieved in accordance with OAC 3745-40-09.

T. A Sampling Plan shall be maintained by the permittee. The plan shall include, at a minimum, the following for all required sampling:

- a. Sample collection or monitoring locations.
- b. Sample or monitoring frequency.
- c. Sample collection or monitoring procedures.
- d. Sample storage and preservation procedures.
- e. For composite samples of biosolids, a minimum of six grab samples collected at such times and locations, and in such fashion, as to be representative of the biosolids generated at the facility for beneficial use.

U. Monitoring for Dissolved Orthophosphate (as P)

The permittee shall monitor for dissolved orthophosphate by grab sample. The permittee shall filter the grab sample within 15 minutes of collection using a 0.45 micron filter. The filtered sample must be analyzed within 48 hours. Samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's overall performance.

V. Monitoring for Bis(2-ethylhexyl) Phthalate

Composite samples for Bis(2-ethylhexyl) phthalate shall be comprised of at least three manual grab

samples collected at intervals of at least 3 hours, during an 8 hour period that the plant is staffed for sampling. The samples shall be collected and composited in glass to eliminate the potential for contamination from plastic containers; and they shall be collected at such times and locations, and in such fashion, as to be representative of the facility's overall performance.

W. Monitoring for Mercury (low-level)

The permittee shall use EPA Method 1631 promulgated under 40 CFR 136 to comply with the influent and effluent mercury monitoring requirements of this permit.

X. Outfall Signage

The permittee shall maintain a permanent marker on the stream bank at each outfall that is regulated under this NPDES permit. This includes final outfalls, bypasses, and combined sewer overflows. The sign shall include, at a minimum, the name of the establishment to which the permit was issued, the Ohio EPA permit number, and the outfall number and a contact telephone number. The information shall be printed in letters not less than two inches in height. The sign shall be a minimum of 2 feet by 2 feet and shall be a minimum of 3 feet above ground level. The sign shall not be obstructed such that persons in boats or persons swimming on the river or someone fishing or walking along the shore cannot read the sign. Vegetation shall be periodically removed to keep the sign visible. If the outfall is normally submerged the sign shall indicate that. If the outfall is a combined sewer outfall, the sign shall indicate that untreated human sewage may be discharged from the outfall during wet weather and that harmful bacteria may be present in the water. When an existing sign is replaced or reset, the new sign shall comply with the requirements of this section.

Y. Method Detection Limits

The permittee shall use analytical procedures approved under 40 CFR 136 with method detection limits (MDLs) less than or equal to those listed below to comply with the monitoring requirements for the following parameters:

Parameter	MDL (?g/L)
Silver	1.0
bis(2-ethylehxy)phthalate	2.0

Z. Stormwater No Exposure Certification

To comply with industrial storm water regulations, the permittee has obtained coverage under the industrial stormwater general permit 2GR00549*GG (9/1/2022). No later than 9/1/2027, the permittee must submit a new form for "No Exposure Certification" or make other provisions to comply with industrial stormwater regulations.

AA. Biomonitoring

Biomonitoring Program Requirements

The permittee shall continue to implement an effluent biomonitoring program to determine the toxicity of the effluent from outfall 2PD00011001.

1. General Requirements

All toxicity testing conducted as required by this permit shall be done in accordance with "Reporting and Testing Guidance for Biomonitoring Required by the Ohio Environmental Protection Agency" (hereinafter, the "biomonitoring guidance"), Ohio EPA, July 1998 (or current revision). The Standard Operating Procedures (SOP) or verification of SOP submittal, as described in Section 1.B. of the biomonitoring guidance shall be submitted no later than three months after the effective date of this permit. If the laboratory performing the testing has modified its protocols, a new SOP is required.

2. Testing Requirements

a. Chronic Bioassays

For the duration of the permit, the permittee shall conduct annual chronic toxicity tests using *Ceriodaphnia dubia* and fathead minnows (*Pimephales promelas*) on effluent samples from outfall 2PD00011001. These tests shall be conducted as specified in Section 3 of the biomonitoring guidance. Acute endpoints, as described in Section 2.H. of the biomonitoring guidance, shall be determined from the chronic test results.

3. Testing of Ambient Water

In conjunction with the acute and chronic toxicity tests, upstream control water shall be collected at a point outside the zone of effluent and receiving water interaction at station 2PD00011801. Testing of ambient waters shall be done in accordance with Sections 2 and 3 of the biomonitoring guidance.

4. Data Review

a. Reporting

Following completion of each annual bioassay requirement, the permittee shall report results of the tests in accordance with Sections 2.H.1., 2.H.2.a., 3.H.1., and 3.H.2.a. of the biomonitoring guidance, including reporting the results on the monthly DMR and submitting a copy of the complete test report to Ohio EPA, Division of Surface Water. The test report may be submitted electronically using the acute or chronic NPDES Biomonitoring Report Form available through the Ohio EPA eBusiness Center, Division of Surface Water NPDES Permit Applications service. Alternatively, the permittee may submit a hard copy of the report to Ohio EPA, Division of Surface Water, NPDES Permit Unit, P.O. Box 1049, Columbus, OH, 43216-1049.

Based on Ohio EPA's evaluation of the results, this permit may be modified to require additional biomonitoring, require a toxicity reduction evaluation, and/or contain whole effluent toxicity limits.

b. Definitions

$TU_a = \text{Acute Toxicity Units} = 100/LC_{50}$

$TU_c = \text{Chronic Toxicity Units} = 100/IC_{25}$

This equation for chronic toxicity units applies outside the mixing zone for warmwater, modified warmwater, exceptional warmwater, coldwater, and seasonal salmonid use designations except when the following equation is more restrictive (*Ceriodaphnia dubia* only):

$TUc = \text{Chronic Toxic Units} = 100/\text{square root of (NOEC} \times \text{LOEC)}$

AB. Pretreatment

Pretreatment Program Requirements

The permittee's pretreatment program initially approved on November 30, 1984 and all subsequent modifications approved before the effective date of this permit, shall be an enforceable term and condition of this permit.

To ensure that the approved program is implemented in accordance with 40 CFR 403, Chapter 3745-3 of Ohio Administrative Code and Chapter 6111 of the Ohio Revised Code, the permittee shall comply with the following conditions:

1. Legal Authority

The permittee shall adopt and maintain legal authority which enables it to fully implement and enforce all aspects of its approved pretreatment program including the identification and characterization of industrial sources, issuance of control documents, compliance monitoring and reporting, and enforcement. The permittee shall establish agreements with all contributing jurisdictions, as necessary, to enable the permittee to fulfill its requirements with respect to industrial users discharging to its system.

2. Funding

The permittee shall have sufficient resources and qualified personnel to fully implement all aspects of its approved pretreatment program.

3. Industrial User Inventory

The permittee shall identify all industrial users subject to pretreatment standards and requirements and characterize the nature and volume of pollutants in their wastewater. Dischargers determined to be Significant Industrial Users according to OAC 3745-3-01 must be notified of applicable pretreatment standards and requirements within 30 days of making such a determination. This inventory shall be updated at a frequency to ensure proper identification and characterization of industrial users.

4. Slug Load Control Plans for Significant Industrial Users

The permittee shall evaluate the need for a plan, device or structure to control a potential slug discharge at least once during the term of each significant industrial user's control mechanism. Existing significant industrial users shall be evaluated within one year of the effective date of this permit if the users have never been evaluated. New industrial users identified as significant industrial users shall be evaluated within one year of being identified as a significant industrial user.

5. Local Limits

The permittee shall develop and enforce technically based local limits to prevent the introduction of pollutants into the POTW which will interfere with the operation of the POTW, pass through the treatment works, be incompatible with the treatment works, or limit wastewater or sludge use options. The permittee shall use the following waste load allocation values when evaluating local limits for the following pollutants for which a final effluent limit has not been established:

Arsenic 110 ug/L
Cadmium 5.2 ug/L
Chromium, hexavalent 11 ug/L
Chromium, total 110 ug/L
Copper 21 ug/L
Free Cyanide 12 ug/L
Lead 22 ug/L
Mercury 12 ng/L
Molybdenum 20,000 ug/L
Nickel 120 ug/L
Selenium 5 ug/L

For the purpose of periodically reevaluating local limits, the permittee shall implement and maintain a sampling program to characterize pollutant contribution to the POTW from industrial and residential sources and to determine pollutant removal efficiencies through the POTW. The permittee shall continue to review and develop local limits as necessary.

6. Control Mechanisms

The permittee shall issue control mechanisms to all industries determined to be Significant Industrial Users as defined in OAC 3745-3-01. Control mechanisms must meet at least the minimum requirements of OAC-3745-3-03(C)(1)(c).

7. Industrial Compliance Monitoring

The permittee shall sample and inspect industrial users in accordance with the approved program or approved modifications, including inspection and sampling of all significant industrial users at least annually. Sample collection, preservation and analysis must be performed in accordance with procedures in 40 CFR 136 and with sufficient care to produce evidence admissible in judicial enforcement proceedings. The permittee shall also require, receive, and review self-monitoring and other industrial user reports when necessary to determine compliance with pretreatment standards and requirements. If the permittee performs sampling and analysis in lieu of an industrial user's self-monitoring, the permittee shall perform repeat sampling and analysis within 30 days of becoming aware of a permit violation, unless the permittee notifies the user of the violation and requires the user to perform the repeat analysis and reporting.

8. POTW Priority Pollutant Monitoring

The permittee shall annually monitor priority pollutants, as defined by U.S. EPA, in the POTW's influent, effluent and sludge. Sample collection, preservation, and analysis shall be performed using U.S. EPA approved methods.

a. A sample of the influent and the effluent shall be collected when industrial discharges are occurring at normal to maximum levels. Sampling of the influent shall be done prior to any recycle streams and sampling of the effluent shall be after disinfection. Both samples shall be collected on the same day or, alternately, the effluent sample may be collected following the influent sample by approximately the retention time of the POTW.

Sampling of sludge shall be representative of sludge removed to final disposal. A minimum of one grab sample shall be taken during actual sludge removal and disposal unless the POTW uses more than one

disposal option. If multiple disposal options are used, the POTW shall collect a composite of grab samples from all disposal practices which are proportional to the annual flows to each type of disposal.

b. The results of these samples must be submitted on Ohio EPA Form 4221 with the permittee's annual pretreatment report. Samples may be collected at any time during the 12 months preceding the due date of the annual report and may be used to fulfill other NPDES monitoring requirements where applicable.

9. Enforcement

The permittee shall investigate all instances of noncompliance with pretreatment standards and requirements and take timely, appropriate, and effective enforcement action to resolve the noncompliance in accordance with the permittee's approved enforcement response plan.

On or prior to September 15th of each year, the permittee shall publish, in a newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the permittee, a list of industrial users which, during the previous 12 months, have been in Significant Noncompliance [OAC 3745-3-03(C)(2)(h)] with applicable pretreatment standards or requirements.

10. Reporting

All reports required under this section shall be submitted either through Ohio EPA's eBusiness Center or by mail. The Ohio EPA eBusiness Center can be found in the link: <https://ebiz.epa.ohio.gov/login.html>. If submitting hardcopies by mail, reports shall be sent to the following address in duplicate:

Ohio Environmental Protection Agency
Division of Surface Water
Pretreatment Unit
P.O. Box 1049 Columbus, OH 43216-1049

a. Quarterly Industrial User Violation Report

On or prior to the 15th day of March, June, September, and December, the permittee shall report the industrial users that are in violation of applicable pretreatment standards during the previous quarter. The report shall be prepared in accordance with guidance provided by Ohio EPA and shall include a description of all industrial user violations and corrective actions taken to resolve the violations.

b. Annual Pretreatment Report

On or prior to September 15th of each year, the permittee shall submit an annual report on the effectiveness of the pretreatment program. The report shall be prepared in accordance with guidance provided by Ohio EPA and shall include, but not be limited to: a discussion of program effectiveness; an industrial user inventory; a description of the permittee's monitoring program; a description of any pass through or interference incidents; a copy of the annual publication of industries in Significant Noncompliance; and priority pollutant monitoring results.

11. Record Keeping

All records of pretreatment activities including, but not limited to, industrial inventory data, monitoring results, enforcement actions, and reports submitted by industrial users must be maintained for a minimum of three (3) years. This period of retention shall be extended during the course of any unresolved litigation. Records must be made available to Ohio EPA and U.S. EPA upon request.

12. Program Modifications

Any proposed modifications of the approved pretreatment program must be submitted to Ohio EPA for review, on forms available from Ohio EPA and consistent with guidance provided by Ohio EPA. If the modification is deemed to be substantial, prior approval must be obtained before implementation; otherwise, the modification is considered to be effective 45 days after the date of application. Substantial program modifications include, among other things, changes to the POTW's legal authority, industrial user control mechanisms, local limits, confidentiality procedures, or monitoring frequencies.

PART III - GENERAL CONDITIONS

1. DEFINITIONS

"Daily discharge" means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

"Average weekly" discharge limitation means the highest allowable average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week. Each of the following 7-day periods is defined as a calendar week: Week 1 is Days 1 - 7 of the month; Week 2 is Days 8 - 14; Week 3 is Days 15 - 21; and Week 4 is Days 22 - 28. If the "daily discharge" on days 29, 30 or 31 exceeds the "average weekly" discharge limitation, Ohio EPA may elect to evaluate the last 7 days of the month as Week 4 instead of Days 22 - 28. Compliance with fecal coliform bacteria or *E. coli* bacteria limitations shall be determined using the geometric mean.

"Average monthly" discharge limitation means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month. Compliance with fecal coliform bacteria or *E. coli* bacteria limitations shall be determined using the geometric mean.

"85 percent removal" means the arithmetic mean of the values for effluent samples collected in a period of 30 consecutive days shall not exceed 15 percent of the arithmetic mean of the values for influent samples collected at approximately the same times during the same period.

"Absolute Limitations" Compliance with limitations having descriptions of "shall not be less than," "nor greater than," "shall not exceed," "minimum," or "maximum" shall be determined from any single value for effluent samples and/or measurements collected.

"Net concentration" shall mean the difference between the concentration of a given substance in a sample taken of the discharge and the concentration of the same substances in a sample taken at the intake which supplies water to the given process. For the purpose of this definition, samples that are taken to determine the net concentration shall always be 24-hour composite samples made up of at least six increments taken at regular intervals throughout the plant day.

"Net Load" shall mean the difference between the load of a given substance as calculated from a sample taken of the discharge and the load of the same substance in a sample taken at the intake which supplies water to given process. For purposes of this definition, samples that are taken to determine the net loading shall always be 24-hour composite samples made up of at least six increments taken at regular intervals throughout the plant day.

"MGD" means million gallons per day.

"mg/l" means milligrams per liter.

"ug/l" means micrograms per liter.

"ng/l" means nanograms per liter.

"S.U." means standard pH unit.

"kg/day" means kilograms per day.

"Reporting Code" is a five digit number used by the Ohio EPA in processing reported data. The reporting code does not imply the type of analysis used nor the sampling techniques employed.

"Quarterly (1/Quarter) sampling frequency" means the sampling shall be done in the months of March, June, August, and December, unless specifically identified otherwise in the Effluent Limitations and Monitoring Requirements table.

"Yearly (1/Year) sampling frequency" means the sampling shall be done in the month of September, unless specifically identified otherwise in the effluent limitations and monitoring requirements table.

"Semi-annual (2/Year) sampling frequency" means the sampling shall be done during the months of June and December, unless specifically identified otherwise.

"Winter" shall be considered to be the period from November 1 through April 30.

"Bypass" means the intentional diversion of waste streams from any portion of the treatment facility.

"Summer" shall be considered to be the period from May 1 through October 31.

"Severe property damage" means substantial physical damage to property, damage to the treatment facilities which would cause them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

"Sewage sludge" means a solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works as defined in section 6111.01 of the Revised Code. "Sewage sludge" includes, but is not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment processes. "Sewage sludge" does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator, grit and screenings generated during preliminary treatment of domestic sewage in a treatment works, animal manure, residue generated during treatment of animal manure, or domestic septage.

"Biosolids" means sewage sludge or mixtures containing sewage sludge that have been treated for beneficial use.

"Sewage sludge weight" means the weight of sewage sludge, in dry U.S. tons, including admixtures such as liming materials or bulking agents. Monitoring frequencies for sewage sludge parameters are based on the reported sludge weight generated in a calendar year (use the most recent calendar year data when the NPDES permit is up for renewal).

"Sewage sludge fee weight" means the weight of sewage sludge, in dry U.S. tons, excluding admixtures

such as liming materials or bulking agents. Annual sewage sludge fees, as per section 3745.11(Y) of the Ohio Revised Code, are based on the reported sludge fee weight for the most recent calendar year.

2. GENERAL EFFLUENT LIMITATION

The effluent shall, at all times, be free of substances:

- A. In amounts that will settle to form putrescent, or otherwise objectionable, sludge deposits; or that will adversely affect aquatic life or waterfowl;
- B. Of an oily, greasy, or surface-active nature, and of other floating debris, in amounts that will form noticeable accumulations of scum, foam, or sheen;
- C. In amounts that will alter the natural color or odor of the receiving water to such degree as to create a nuisance;
- D. In amounts that either singly or in combination with other substances are toxic to human, animal, or aquatic life;
- E. In amounts that are conducive to the growth of aquatic weeds or algae to the extent that such growth become inimical to more desirable forms of aquatic life, or create conditions that are unsightly, or constitute a nuisance in any other fashion;
- F. In amounts that will impair designated instream or downstream water uses.

3. FACILITY OPERATION AND QUALITY CONTROL

All wastewater treatment works shall be operated in a manner consistent with the following:

- A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.
- B. The permittee shall effectively monitor the operation and efficiency of treatment and control facilities and the quantity and quality of the treated discharge.
- C. Maintenance of wastewater treatment works that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by Ohio EPA as specified in the Paragraph in the PART III entitled, "UNAUTHORIZED DISCHARGES".

4. REPORTING

- A. Monitoring data required by this permit shall be submitted monthly on Ohio EPA 4500 Discharge Monitoring Report (DMR) forms using the electronic DMR (e-DMR) internet application. e-DMR allows permitted facilities to enter, sign, and submit DMRs on the internet. e-DMR information is found on the following web page:

<https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/electronic-business-services>

B. DMRs shall be signed by a facility's Responsible Official or a Delegated Responsible Official (i.e. a person delegated by the Responsible Official). The Responsible Official of a facility is defined as:

1. For a corporation: by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (a) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or (b) The manager of one or more manufacturing, production or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
2. For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
3. In the case of a municipal, state, or other public facility, by either the principal executive officer, the ranking elected official or other duly authorized employee.

For e-DMR, the person signing and submitting the DMR will need to obtain an eBusiness Center account and Personal Identification Number (PIN). Additionally, Delegated Responsible Officials must be delegated by the Responsible Official, either on-line using the eBusiness Center's delegation function, or on a paper delegation form provided by Ohio EPA. For more information on the PIN and delegation processes, please view the following web page:

<https://epa.ohio.gov/help-center/ebusiness-center>

C. DMRs submitted using e-DMR shall be submitted to Ohio EPA by the 20th day of the month following the month-of-interest.

D. If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in Section 5. SAMPLING AND ANALYTICAL METHODS, the results of such monitoring shall be included in the calculation and reporting of the values required in the reports specified above.

E. Analyses of pollutants not required by this permit, except as noted in the preceding paragraph, shall not be reported to the Ohio EPA, but records shall be retained as specified in Section 7. RECORDS RETENTION.

5. SAMPLING AND ANALYTICAL METHOD

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored flow. Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures for the Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements.

6. RECORDING OF RESULTS

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- A. The exact place and date of sampling; (time of sampling not required on EPA 4500)
- B. The person(s) who performed the sampling or measurements;
- C. The date the analyses were performed on those samples;
- D. The person(s) who performed the analyses;
- E. The analytical techniques or methods used; and
- F. The results of all analyses and measurements.

7. RECORDS RETENTION

The permittee shall retain all of the following records for the wastewater treatment works for a minimum of three years except those records that pertain to the treatment, storage, transfer, or disposal, and the beneficial use of biosolids, which shall be kept for a minimum of five years, including:

- A. All sampling and analytical records (including internal sampling data not reported);
- B. All original recordings for any continuous monitoring instrumentation;
- C. All instrumentation, calibration and maintenance records;
- D. All treatment works operation and maintenance records;
- E. All reports required by this permit; and
- F. Records of all data used to complete the application for this permit for a period of at least three years, or five years for sewage sludge or biosolids, from the date of the sample, measurement, report, or application.

These periods will be extended during the course of any unresolved litigation, or when requested by the Regional Administrator or the Ohio EPA. The three-year period, or five-year period for sewage sludge or biosolids, for retention of records shall start from the date of sample, measurement, report, or application.

8. AVAILABILITY OF REPORTS

Except for data determined by the Ohio EPA to be entitled to confidential status, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate district offices of the Ohio EPA. Both the Clean Water Act and Section 6111.05 Ohio Revised Code state that effluent data and receiving water quality data shall not be considered confidential.

9. DUTY TO PROVIDE INFORMATION

The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

10. RIGHT OF ENTRY

The permittee shall allow the Director or an authorized representative upon presentation of credentials and other documents as may be required by law to:

- A. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.
- C. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.
- D. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

11. UNAUTHORIZED DISCHARGES

A. Bypass Not Exceeding Limitations - The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 11.B and 11.C.

B. Notice

- 1. Anticipated Bypass - If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible, at least ten days before the date of the bypass.
- 2. Unanticipated Bypass - The permittee shall submit notice of an unanticipated bypass as required in paragraph 12.B (24-hour notice).

C. Prohibition of Bypass

- 1. Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass, unless:
 - a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - c. The permittee submitted notices as required under paragraph 11.B.
- 2. The Director may approve an anticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed above in paragraph 11.C.1.

12. NONCOMPLIANCE NOTIFICATION

A. Exceedance of a Daily Maximum Discharge Limit

1. The permittee shall report noncompliance that is the result of any violation of a daily maximum discharge limit for any of the pollutants listed by the Director in the permit by e-mail or telephone within twenty-four (24) hours of discovery. The permittee may report to the appropriate Ohio EPA district office e-mail account as follows (this method is preferred):

Southeast District Office: sedo24hournpdes@epa.ohio.gov
Southwest District Office: swdo24hournpdes@epa.ohio.gov
Northwest District Office: nwdo24hournpdes@epa.ohio.gov
Northeast District Office: nedo24hournpdes@epa.ohio.gov
Central District Office: cdo24hournpdes@epa.ohio.gov
Central Office: co24hournpdes@epa.ohio.gov

The permittee shall attach a noncompliance report to the email. A noncompliance report form is available on the following website under the Monitoring and Reporting - Non-Compliance Notification section: <https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/individual-wastewater-discharge-permits>

Or, the permittee may report to the appropriate Ohio EPA district office by telephone toll-free between 8:00 AM and 5:00 PM as follows:

Southeast District Office: (800) 686-7330
Southwest District Office: (800) 686-8930
Northwest District Office: (800) 686-6930
Northeast District Office: (800) 686-6330
Central District Office: (800) 686-2330
Central Office: (614) 644-2001

The permittee shall include the following information in the telephone noncompliance report:

- a. The name of the permittee, and a contact name and telephone number;
- b. The limit(s) that has been exceeded;
- c. The extent of the exceedance(s);
- d. The cause of the exceedance(s);
- e. The period of the exceedance(s) including exact dates and times;
- f. If uncorrected, the anticipated time the exceedance(s) is expected to continue; and,
- g. Steps taken to reduce, eliminate or prevent occurrence of the exceedance(s).

B. Other Permit Violations

1. The permittee shall report noncompliance that is the result of any unanticipated bypass resulting in an exceedance of any effluent limit in the permit or any upset resulting in an exceedance of any effluent limit in the permit by e-mail or telephone within twenty-four (24) hours of discovery. The permittee may report to the appropriate Ohio EPA district office e-mail account as follows (this method is preferred):

Southeast District Office: sedo24hournpdes@epa.ohio.gov
Southwest District Office: swdo24hournpdes@epa.ohio.gov
Northwest District Office: nwdo24hournpdes@epa.ohio.gov
Northeast District Office: nedo24hournpdes@epa.ohio.gov
Central District Office: cdo24hournpdes@epa.ohio.gov
Central Office: co24hournpdes@epa.ohio.gov

The permittee shall attach a noncompliance report to the e-mail. A noncompliance report form is available on the following web site under the Monitoring and Reporting - Non-Compliance Notification section: <https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/individual-wastewater-discharge-permits>

Or, the permittee may report to the appropriate Ohio EPA district office by telephone toll-free between 8:00 AM and 5:00 PM as follows:

Southeast District Office: (800) 686-7330
Southwest District Office: (800) 686-8930
Northwest District Office: (800) 686-6930
Northeast District Office: (800) 686-6330
Central District Office: (800) 686-2330
Central Office: (614) 644-2001

The permittee shall include the following information in the telephone noncompliance report:

- a. The name of the permittee, and a contact name and telephone number;
 - b. The time(s) at which the discharge occurred, and was discovered;
 - c. The approximate amount and the characteristics of the discharge;
 - d. The stream(s) affected by the discharge;
 - e. The circumstances which created the discharge;
 - f. The name and telephone number of the person(s) who have knowledge of these circumstances;
 - g. What remedial steps are being taken; and,
 - h. The name and telephone number of the person(s) responsible for such remedial steps.
2. The permittee shall report noncompliance that is the result of any spill or discharge which may endanger human health or the environment within thirty (30) minutes of discovery by calling the 24-Hour Emergency Hotline toll-free at (800) 282-9378. The permittee shall also report the spill or discharge by e-mail or telephone within twenty-four (24) hours of discovery in accordance with B.1 above.
- C. When the telephone option is used for the noncompliance reports required by A and B, the permittee shall submit to the appropriate Ohio EPA district office a confirmation letter and a completed noncompliance report within five (5) days of the discovery of the noncompliance. This follow up report is not necessary for the e-mail option which already includes a completed noncompliance report.
- D. If the permittee is unable to meet any date for achieving an event, as specified in a schedule of compliance in their permit, the permittee shall submit a written report to the appropriate Ohio EPA district office within fourteen (14) days of becoming aware of such a situation. The report shall include the following:
1. The compliance event which has been or will be violated;
 2. The cause of the violation;
 3. The remedial action being taken;
 4. The probable date by which compliance will occur; and
 5. The probability of complying with subsequent and final events as scheduled.

E. The permittee shall report all other instances of permit noncompliance not reported under paragraphs A or B of this section on their monthly DMR submission. The DMR shall contain comments that include the information listed in paragraphs A or B as appropriate.

F. If the permittee becomes aware that it failed to submit an application, or submitted incorrect information in an application or in any report to the director, it shall promptly submit such facts or information.

13. RESERVED

14. DUTY TO MITIGATE

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

15. AUTHORIZED DISCHARGES

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than, or at a level in excess of, that authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such violations may result in the imposition of civil and/or criminal penalties as provided for in Section 309 of the Act and Ohio Revised Code Sections 6111.09 and 6111.99.

16. DISCHARGE CHANGES

The following changes must be reported to the appropriate Ohio EPA district office as soon as practicable:

A. For all treatment works, any significant change in character of the discharge which the permittee knows or has reason to believe has occurred or will occur which would constitute cause for modification or revocation and reissuance. The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Notification of permit changes or anticipated noncompliance does not stay any permit condition.

B. For publicly owned treatment works:

1. Any proposed plant modification, addition, and/or expansion that will change the capacity or efficiency of the plant;
2. The addition of any new significant industrial discharge; and
3. Changes in the quantity or quality of the wastes from existing tributary industrial discharges which will result in significant new or increased discharges of pollutants.

C. For non-publicly owned treatment works, any proposed facility expansions, production increases, or process modifications, which will result in new, different, or increased discharges of pollutants.

Following this notice, modifications to the permit may be made to reflect any necessary changes in permit conditions, including any necessary effluent limitations for any pollutants not identified and limited herein. A determination will also be made as to whether a National Environmental Policy Act (NEPA) review will be required. Sections 6111.44 and 6111.45, Ohio Revised Code, require that plans for

treatment works or improvements to such works be approved by the Director of the Ohio EPA prior to initiation of construction.

D. In addition to the reporting requirements under 40 CFR 122.41(l) and per 40 CFR 122.42(a), all existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

1. That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis of any toxic pollutant which is not limited in the permit. If that discharge will exceed the highest of the "notification levels" specified in 40 CFR Sections 122.42(a)(1)(i) through 122.42(a)(1)(iv).
2. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" specified in 122.42(a)(2)(i) through 122.42(a)(2)(iv).

17. TOXIC POLLUTANTS

The permittee shall comply with effluent standards or prohibitions established under Section 307 (a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement. Following establishment of such standards or prohibitions, the Director shall modify this permit and so notify the permittee.

18. PERMIT MODIFICATION OR REVOCATION

A. After notice and opportunity for a hearing, this permit may be modified or revoked, by the Ohio EPA, in whole or in part during its term for cause including, but not limited to, the following:

1. Violation of any terms or conditions of this permit;
2. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
3. Change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge.

B. Pursuant to rule 3745-33-04, Ohio Administrative Code, the permittee may at any time apply to the Ohio EPA for modification of any part of this permit. The filing of a request by the permittee for a permit modification or revocation does not stay any permit condition. The application for modification should be received by the appropriate Ohio EPA district office at least ninety days before the date on which it is desired that the modification become effective. The application shall be made only on forms approved by the Ohio EPA.

19. TRANSFER OF OWNERSHIP OR CONTROL

This permit may be transferred or assigned, and a new owner or successor can be authorized to discharge from this facility, provided the following requirements are met:

- A. The permittee shall notify the succeeding owner or successor of the existence of this permit by a letter, a copy of which shall be forwarded to the appropriate Ohio EPA district office. The copy of that letter will serve as the permittee's notice to the Director of the proposed transfer. The copy of that letter shall be received by the appropriate Ohio EPA district office sixty (60) days prior to the proposed date of transfer;

B. A written agreement containing a specific date for transfer of permit responsibility and coverage between the current and new permittee (including acknowledgement that the existing permittee is liable for violations up to that date, and that the new permittee is liable for violations from that date on) shall be submitted to the appropriate Ohio EPA district office within sixty days after receipt by the district office of the copy of the letter from the permittee to the succeeding owner;

At any time during the sixty (60) day period between notification of the proposed transfer and the effective date of the transfer, the Director may prevent the transfer if he concludes that such transfer will jeopardize compliance with the terms and conditions of the permit. If the Director does not prevent transfer, he will modify the permit to reflect the new owner.

20. OIL AND HAZARDOUS SUBSTANCE LIABILITY

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Clean Water Act.

21. SOLIDS DISPOSAL

Collected grit and screenings, and other solids other than sewage sludge or biosolids, shall be disposed of in such a manner as to prevent entry of those wastes into waters of the state, and in accordance with all applicable laws and rules.

22. CONSTRUCTION AFFECTING NAVIGABLE WATERS

This permit does not authorize or approve the construction of any onshore or offshore physical structures or facilities or the undertaking of any work in any navigable waters.

23. CIVIL AND CRIMINAL LIABILITY

Except as exempted in the permit conditions on UNAUTHORIZED DISCHARGES or UPSETS, nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

24. STATE LAWS AND REGULATIONS

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation under authority preserved by Section 510 of the Clean Water Act.

25. PROPERTY RIGHTS

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

26. UPSET

The provisions of 40 CFR Section 122.41(n), relating to "Upset," are specifically incorporated herein by reference in their entirety. For definition of "upset," see Part III, Paragraph 1, DEFINITIONS.

27. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

28. SIGNATORY REQUIREMENTS

All applications submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22.

All reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR Section 122.22.

29. OTHER INFORMATION

A. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

B. ORC 6111.99 provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than \$25,000 per violation.

C. ORC 6111.99 states that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than \$25,000 per violation.

D. ORC 6111.99 provides that any person who violates Sections 6111.04, 6111.042, 6111.05, or division (A) of Section 6111.07 of the Revised Code shall be fined not more than \$25,000 or imprisoned not more than one year, or both.

30. NEED TO HALT OR REDUCE ACTIVITY

40 CFR 122.41(c) states that it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with conditions of this permit.

31. APPLICABLE FEDERAL RULES

All references to 40 CFR in this permit mean the version of 40 CFR which is effective as of the effective date of this permit.

32. AVAILABILITY OF PUBLIC SEWERS

Notwithstanding the issuance or non-issuance of an NPDES permit to a semi-public disposal system, whenever the sewage system of a publicly owned treatment works becomes available and accessible, the permittee operating any semi-public disposal system shall abandon the semi-public disposal system and connect it into the publicly owned treatment works.

National Pollutant Discharge Elimination System (NPDES) Permit Program

FACT SHEET

Regarding an NPDES Permit to Discharge to Waters of the State of Ohio
For City of Marion Water Pollution Control (WPC)

Public Notice No.: 210315
Public Notice Date: 3/7/2025
Comment Period Ends: 4/6/2025

Ohio EPA Permit No.: 2PD00011*SD
Application No.: OH0026352

Name and Address of Applicant:
City of Marion
233 West Center Street
Marion, OH 43302

Name and Address of Facility Where
Discharge Occurs:
Marion WPC
1810 Marion-Agosta Road
Marion, OH 43302
Marion County

Receiving Water: Little Scioto River

Subsequent Stream Network: Scioto River to Ohio River

INTRODUCTION

Development of a Fact Sheet for NPDES permits is mandated by Title 40 of the Code of Federal Regulations (CFR), Section 124.8 and 124.56. This document fulfills the requirements established in those regulations by providing the information necessary to inform the public of actions proposed by the Ohio Environmental Protection Agency (Ohio EPA), as well as the methods by which the public can participate in the process of finalizing those actions.

This Fact Sheet is prepared in order to document the technical basis and risk management decisions that are considered in the determination of water quality based NPDES Permit effluent limitations. The technical basis for the Fact Sheet may consist of evaluations of promulgated effluent guidelines, existing effluent quality, instream biological, chemical, and physical conditions, and the relative risk of alternative effluent limitations. This Fact Sheet details the discretionary decision-making process empowered to the Director by the Clean Water Act (CWA) and Ohio Water Pollution Control Law (Ohio Revised Code [ORC] 6111). Decisions to award variances to Water Quality Standards (WQS) or promulgated effluent guidelines for economic or technological reasons will also be justified in the Fact Sheet where necessary.

Antidegradation provisions in Ohio Administrative Code (OAC) Chapter 3745-1 describe the conditions under which water quality may be lowered in surface waters. No antidegradation review was necessary.

Effluent limits based on available treatment technologies are required by Section 301(b) of the CWA. Many of these have already been established by the United States Environmental Protection Agency (U.S. EPA) in the effluent guideline regulations (a.k.a. categorical regulations) for industry categories in 40 CFR Parts 405-499. Technology-based regulations for publicly-owned treatment works are listed in the Secondary Treatment Regulations (40 CFR Part 133). If regulations have not been established for a category of dischargers, the director may establish technology-based limits based on best professional judgment (BPJ).

Ohio EPA reviews the need for water-quality-based limits on a pollutant-by-pollutant basis. Wasteload allocations (WLAs) are used to develop these limits based on the pollutants that have been detected in the discharge, and the receiving water's assimilative capacity. The assimilative capacity depends on the flow in the water receiving the discharge, and the concentration of the pollutant upstream. The greater the upstream flow, and the lower the upstream concentration, the greater the assimilative capacity is. Assimilative capacity may represent dilution (as in allocations for metals), or it may also incorporate the break-down of pollutants in the receiving water (as in allocations for oxygen-demanding materials).

The need for water-quality-based limits is determined by comparing the WLA for a pollutant to a measure of the effluent quality. The measure of effluent quality is called Projected Effluent Quality (PEQ). This is a statistical measure of the average and maximum effluent values for a pollutant. As with any statistical method, the more data that exists for a given pollutant, the more likely that PEQ will match the actual observed data. If there is a small data set for a given pollutant, the highest measured value is multiplied by a statistical factor to obtain a PEQ; for example, if only one sample exists, the factor is 6.2, for two samples - 3.8, for three samples - 3.0. The factors continue to decline as samples sizes increase. These factors are intended to account for effluent variability, but if the pollutant concentrations are fairly constant, these factors may make PEQ appear larger than it would be shown to be if more sample results existed.

SUMMARY OF PERMIT CONDITIONS

The effluent limits and/or monitoring requirements proposed for all parameters are the same as in the current permit, except those listed below.

New effluent limits are proposed for silver, dibenz(a,h) anthracene, and bis(2-ethylhexyl) phthalate based on the reasonable potential analysis. A compliance schedule is proposed to meet the new effluent limits.

Lower effluent limits are proposed for zinc based on the waste load allocation.

New monitoring is proposed for selenium, and bromodichloromethane based on the reasonable potential analysis.

Limits are proposed to be removed for total filterable residue and free cyanide based on the reasonable potential analysis. Monitoring is proposed to continue.

Monitoring requirements are proposed to be removed for strontium and barium because reasonable potential was not observed.

Monitoring requirements are proposed to be removed for total suspended solids and 5-day carbonaceous biochemical oxygen demand (CBOD₅) from the combined sewer overflow monitoring tables because this data is not needed to characterize the overflows.

Monitoring for temperature, pH, and dissolved oxygen is proposed to be removed from the 801 upstream monitoring station because this data is currently not needed.

Monitoring for nitrate & nitrite is proposed to be added at stations 801 and 901 so that nutrient data is collected for future studies.

Semi-Annual chronic toxicity monitoring with the determination of acute endpoints is proposed for the life of the permit. Increased monitoring is proposed based on the detections in July 2021 and based on the WET reasonable potential being group 3.

A schedule of compliance to implement the combined sewer overflow (CSO) long term control plan (LTCP) is proposed to be carried over from the previous permit.

In Part II of the permit, special conditions are included that address sanitary sewer overflow (SSO) reporting; operator certification, minimum staffing, and operator of record; whole effluent toxicity (WET) testing; stormwater compliance; pretreatment program requirements; and outfall signage.

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PROCEDURES FOR PARTICIPATION IN THE FORMULATION OF FINAL DETERMINATIONS

The draft action shall be issued as a final action unless the Director revises the draft after consideration of the record of a public meeting or written comments, or upon disapproval by the Administrator of the U.S. Environmental Protection Agency.

Within thirty days of the date of the Public Notice, any person may request or petition for a public meeting for presentation of evidence, statements, or opinions. The purpose of the public meeting is to obtain additional evidence. Statements concerning the issues raised by the party requesting the meeting are invited. Evidence may be presented by the applicant, the state, and other parties, and following presentation of such evidence other interested persons may present testimony of facts or statements of opinion.

Requests for public meetings shall be in writing and shall state the action of the Director objected to, the questions to be considered, and the reasons the action is contested. Such requests should be emailed to HClerk@epa.ohio.gov or mailed to:

**Legal Records Section
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049**

Interested persons are invited to submit written comments upon the discharge permit. Comments should be submitted by email to epa.dswcomments@epa.ohio.gov (preferred method) or delivered in person or by mail no later than 30 days after the date of this Public Notice. Deliver or mail all comments to:

**Ohio Environmental Protection Agency
Attention: Division of Surface Water
Permits Processing Unit
P.O. Box 1049
Columbus, Ohio 43216-1049**

The Ohio EPA permit number and Public Notice numbers should appear on each page of any submitted comments. All comments received no later than 30 days after the date of the Public Notice will be considered.

Citizens may conduct file reviews regarding specific companies or sites. Appointments are necessary to conduct file reviews because requests to review files have increased dramatically in recent years. The first 250 pages copied are free. For requests to copy more than 250 pages, there is a five-cent charge for each page copied. Payment is required by check or money order, made payable to Treasurer State of Ohio.

For additional information about this fact sheet or the draft permit, contact Luke Heritage, luke.heritage@epa.ohio.gov, 419-419-3711.

INFORMATION REGARDING CERTAIN WATER QUALITY BASED EFFLUENT LIMITS

This draft permit may contain proposed water-quality-based effluent limits (WQBELs) for parameters that **are not** priority pollutants. (See the following link for a list of the priority pollutants: https://epa.ohio.gov/static/Portals/35/pretreatment/Pretreatment_Program_Priority_Pollutant_Detection_Limits.pdf.) In accordance with ORC 6111.03(J)(3), the Director established these WQBELs after considering, to the extent consistent with the Federal Water Pollution Control Act, evidence relating to the technical feasibility and economic reasonableness of removing the polluting properties from those wastes and to evidence relating to conditions calculated to result from that action and their relation to benefits to the people of the state and to

accomplishment of the purposes of this chapter. This determination was made based on data and information available at the time the permit was drafted, which included the contents of the timely submitted NPDES permit renewal application, along with any and all pertinent information available to the Director.

This public notice allows the permittee to provide to the Director for consideration during this public comment period additional site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness for achieving compliance with the proposed final effluent limitations for these parameters. The permittee shall email to epa.dswcomments@epa.ohio.gov (preferred method) or deliver or mail this information to:

**Ohio Environmental Protection Agency
Attention: Division of Surface Water
Permits Processing Unit
P.O. Box 1049
Columbus, Ohio 43216-1049**

Should the applicant need additional time to review, obtain or develop site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness of achieving compliance with these limitations, a written request for any additional time shall be sent to the above address no later than 30 days after the Public Notice Date on Page 1.

Should the applicant determine that compliance with the proposed WQBELs for parameters other than the priority pollutants is technically and/or economically unattainable, the permittee may submit an application for a variance to the applicable WQS used to develop the proposed effluent limitation in accordance with the terms and conditions set forth in OAC 3745-33-07(D). The permittee shall submit this application to the above address no later than 30 days after the Public Notice Date.

Alternately, the applicant may propose the development of site-specific WQS pursuant to OAC 3745-1-39. The permittee shall submit written notification regarding their intent to develop site specific WQS for parameters that are not priority pollutants to the above address no later than 30 days after the Public Notice Date.

LOCATION OF DISCHARGE/RECEIVING WATER USE CLASSIFICATION

Marion WPC discharges to Little Scioto River at River Mile 6.4. Figure 1 shows the approximate location of the facility.

This segment of the Little Scioto River is described by Ohio EPA River Code: 02-158, Hydrologic Unit Code: 05060001-03-03, County: Marion, Ecoregion: Eastern Corn Belt Plains. The Little Scioto River is designated for the following uses under Ohio's WQS (OAC 3745-1-09): Modified Warmwater Habitat, Agricultural Water Supply, Industrial Water Supply, Primary Contact Recreation.

Use designations define the goals and expectations of a waterbody. These goals are set for aquatic life protection, recreation use and water supply use, and are defined in the Ohio WQS (OAC 3745-1-07). The use designations for individual waterbodies are listed in rules -08 through -32 of the Ohio WQS. Once the goals are set, numeric WQS are developed to protect these uses. Different uses have different water quality criteria.

Use designations for aquatic life protection include habitats for coldwater fish and macroinvertebrates, warmwater aquatic life and waters with exceptional communities of warmwater organisms. These uses all meet the goals of the federal CWA. Ohio WQS also include aquatic life use designations for waterbodies which cannot meet the CWA goals because of human-caused conditions that cannot be remedied without causing fundamental changes to land use and widespread economic impact. The dredging and clearing of some small streams to support agricultural or urban drainage is the most common of these conditions. These streams are given Modified Warmwater or Limited Resource Water designations.

Recreation uses are defined by the depth of the waterbody and the potential for wading or swimming. Uses are defined for bathing waters, swimming/canoeing (Primary Contact Recreation) and wading only (Secondary Contact which are generally waters too shallow for swimming or canoeing).

Water supply uses are defined by the actual or potential use of the waterbody. Public Water Supply designations apply near existing water intakes so that waters are safe to drink with standard treatment. Most other waters are designated for agricultural water supply and industrial water supply.

FACILITY DESCRIPTION

Marion WPC was constructed in 1924 and last upgraded in 2020. The average design flow is 10.5 million gallons per day (MGD), peak secondary treatment capacity is 42 MGD, and the peak hydraulic capacity is 51 MGD. Marion WPC serves the City of Marion, Village of Green Camp, Royal Oaks, Eagle Wood/Eagle Creek, and River Valley Trailer Park. Marion WPC has the following treatment processes (Figure 2):

- Screening
- Primary Settling
- Activated Sludge Aeration
- Secondary Clarification
- Chemical Addition
- Tertiary Clarification
- Chlorine Disinfection
- Dechlorination

The City of Marion has 50% separate sewers and 50% combined sewers in the collection system. The City's LTCP was initially submitted in August 2016, amended in January 2020, and approved by Ohio EPA on March 16, 2020. In the LTCP, the City proposed to control CSO discharges to nine events per typical year, which the City's hydraulic model projected to be equivalent to the capture of 95% of wet weather flows. The LTCP proposed a schedule to be implemented over nine phases and completed by December 31, 2044. At a cost of \$95M, the City's Financial Capability Analysis projected that the LTCP would place a "high burden" on the community. A compliance schedule with projects for the next ten years of LTCP implementation is proposed in Part I,C of the permit.

Marion WPC has one bypass, monitored as station 603. When influent flow rates exceed 42 MGD and the 5.0-MG equalization basin is full, flow is diverted after primary treatment and is directed to the chlorine contact tanks. Excess flow up to 9 MGD bypasses secondary treatment and is blended with fully treated effluent prior to monitoring at Outfall 001. The LTCP included an evaluation of feasible alternatives to eliminate bypasses at Marion WPC. Based on that assessment, the City has completed the following improvements in Phase 1 of the LTCP to increase treatment at the facility:

- Installation of a step feed system to allow an increase in existing secondary treatment capacity to 21 MGD
- Installation of the 5.0-MG storage basin to enable the capture of additional flows for secondary treatment.
- Capacity improvements to ensure that an additional 21 MGD would receive secondary treatment.

Marion WPC now has a peak secondary treatment capacity of 42 MGD, which the LTCP identified as the appropriate cut-off point at which flows should be diverted from the secondary treatment system. The remaining 9 MGD of peak flows receive at least solids and floatables removal, primary clarification, and disinfection (when necessary) for a total wet weather peak flow of 51 MGD. Given that these improvements and the remainder of the LTCP are projected to place a high financial burden on the community, it was determined to be infeasible to eliminate bypasses at Marion WPC. U.S. EPA's 1994 CSO Control Policy allows that such a feasible alternatives study in the LTCP is sufficient support for approval of a CSO-related bypass. Therefore, bypasses through station 603 are proposed to be approved as a CSO-related bypass.

The City of Marion has an approved pretreatment program. The City of Marion has 2 categorical users that discharge 0.413 MGD of flow. The City of Marion has four significant non-categorical users that discharge 0.294 MGD of flow.

Marion WPC utilizes the following sewage sludge treatment processes:

- Gravity Thickening
- Mechanical Dewatering Belt Press
- Polymer Addition

Table 1 shows the last five years of sludge removed from Marion WPC. Treated sludge is disposed of in a municipal landfill.

DESCRIPTION OF EXISTING DISCHARGE

Table 2 presents the effluent violations for Marion WPC during the previous five years. The occurrence of effluent violations has decreased significantly since the completion of the Phase 1 plant improvements.

Table 3 presents the average annual effluent flow rate for Marion WPC for the previous five years. Marion WPC estimates there is an infiltration/inflow (I/I) rate to the collection system of 4 MGD Marion WPC performs the following activities to minimize I/I: Collection line replacement and repairs, grouting and implementing the CSO LTCP.

Table 4 presents the number of SSOs reported by Marion WPC for the previous five years. SSOs are reported at station 300. Projects implemented under the LTCP and additional I/I reduction efforts are anticipated to alleviate the persistent SSO and basement backup issues in the collection system.

Table 5 presents data characterizing bypass activity at Marion WPC for the previous five years. Bypasses are reported at station 603.

Table 6 presents the number of CSOs reported by Marion WPC during the previous five years. Marion WPC has three known combined sewer overflows (CSOs). In permit version 2PD00011*QD, CSO monitoring station 005 was added for the Mt Vernon CSO. CSO 005 was deleted from previous permits because it was believed that all combined sewage was separated from the area. However, Sanitary wastewater was discovered to be present in the stormwater that discharged through the Mount Vernon Outfall. The sewer was reconnected into the combined system and the outfall designated as an active CSO.

Table 7 presents data characterizing the annual total phosphorus load from Marion WPC during the previous five years.

Table 8 presents chemical specific data compiled from data reported in annual pretreatment reported and data collected by Ohio EPA. Because this data is substantially identical to the application requirements in CFR 122.21(j), the Director has waived the requirement for submittal of supplemental effluent testing data as part of the NPDES renewal application.

Table 9 presents a summary of unaltered Discharge Monitoring Report (DMR). Data are presented for the period June 2018 through October 2023, and current permit limits are provided for comparison.

Table 10 summarizes the chemical specific data for outfall 001 by presenting the average and maximum PEQ values.

Table 11 summarizes the results of acute and chronic Whole Effluent Toxicity (WET) tests of the final effluent, using the water flea (*Ceriodaphnia dubia*) and fathead minnow (*Pimephales promelas*) as test organisms.

ASSESSMENT OF IMPACT ON RECEIVING WATERS

Pursuant to Section 303(d) of the Clean Water Act, each state is required to develop and submit a list to US EPA of its impaired and threatened waters (e.g., stream/river segments, lakes). For each water on the list, the state identifies the pollutant(s) causing the impairment, when known. The City of Marion – Little Scioto River watershed assessment unit, which includes the Little Scioto River in the vicinity of Marion WPC, is listed as impaired for aquatic life and recreation on Ohio's 303(d) list.

The attainment status of the Little Scioto River is reported in the *Ohio 2024 Integrated Water Quality Monitoring and Assessment Report*. An assessment of the impact of a permitted point source on the immediate receiving waters includes an evaluation of the available chemical/physical, biological, and habitat data which have been collected by Ohio EPA pursuant to the Five-Year Basin Approach for Monitoring and NPDES Reissuance. Other data may be used provided it was collected in accordance with Ohio EPA methods and protocols as specified by the Ohio WQS and Ohio EPA guidance documents. Other information which may be evaluated includes but is not limited to: NPDES permittee self-monitoring data; effluent and mixing zone bioassays conducted by Ohio EPA, the permittee, or U.S. EPA.

In evaluating this data, Ohio EPA attempts to link environmental stresses and measured pollutant exposure to the health and diversity of biological communities. Stresses can include pollutant discharges (permitted and

unpermitted), land use effects, and habitat modifications. Indicators of exposure to these stresses include whole effluent toxicity tests, fish tissue chemical data, and fish health biomarkers (for example, fish blood tests).

Use attainment is a term which describes the degree to which environmental indicators are either above or below criteria specified by the Ohio WQS (OAC 3745-1). Assessing use attainment status for aquatic life uses primarily relies on the Ohio EPA biological criteria (OAC 3745-1-07; Table 7-1). These criteria apply to rivers and streams outside of mixing zones. Numerical biological criteria are based on measuring several characteristics of the fish and macroinvertebrate communities; these characteristics are combined into multimetric biological indices including the Index of Biotic Integrity and modified Index of Well-Being, which indicate the response of the fish community, and the Invertebrate Community Index, which indicates the response of the macroinvertebrate community. Numerical criteria are broken down by ecoregion, use designation, and stream or river size. Ohio has five ecoregions defined by common topography, land use, potential vegetation, and soil type.

Three attainment status results are possible at each sampling location -full, partial, or non-attainment. Full attainment means that all of the applicable indices meet the biocriteria. Partial attainment means that one or more of the applicable indices fails meet the biocriteria. Nonattainment means that either none of the applicable indices meet the biocriteria or one of the organism groups indicates poor or very poor performance. An aquatic life use attainment table (see Table 12) is constructed based on the sampling results and is arranged from upstream to downstream and includes the sampling locations indicated by river mile, the applicable biological indices, the use attainment status (i.e., full, partial, or non), the Qualitative Habitat Evaluation Index, and comments and observations for each sampling location.

The Little Scioto River in the vicinity of the City of Marion WPC is impaired for aquatic life and recreation due to the following: Sedimentation/Siltation, Direct Habitat Alterations, Dissolved Oxygen, Organic Enrichment, Metals, Abnormal Fish Deformities, Polycyclic Aromatic Hydrocarbon (PAHs) and Bacteria. Marion WPC is likely contributing to the impairments in Little Scioto River due to combined sewer overflow discharges and nutrient loading. Ohio EPA conducted a biological and water quality survey in the watershed in 2024 but data is not yet available.

There is historical creosote and PAH contamination in the sediment downstream of the Marion WPC discharge. A U.S. EPA funded sediment removal project is proposed in 2024. This project is the second sediment remediation project on this section of the Little Scioto River. The area for sediment removal is a 3.25 mile segment north of State Route 95 and ending at State Route 739. Contaminated sediment is proposed to be removed from the stream bed, dewatered, solidified, and hauled offsite for proper disposal. The project is projected to occur over the next three years.

The full Integrated Report is available through the Ohio EPA, Division of Surface Water website at: <https://epa.ohio.gov/divisions-and-offices/surface-water/reports-data/ohio-integrated-water-quality-monitoring-and-assessment-report>

The *Biological and Water Quality Study of the Upper Scioto River 2009 & 2011* is available through the Ohio EPA, Division of Surface Water website at: <https://epa.ohio.gov/static/Portals/35/documents/UpperSciotoTSD2012.pdf>

DEVELOPMENT OF WATER-QUALITY-BASED EFFLUENT LIMITS

Determining appropriate effluent concentrations is a multiple-step process in which parameters are identified as likely to be discharged by a facility, evaluated with respect to Ohio water quality criteria, and examined to determine the likelihood that the existing effluent could violate the calculated limits.

Parameter Selection

Effluent data for the Marion WPC were used to determine what parameters should undergo WLA. The parameters discharged are identified by the data available to Ohio EPA, DMR data submitted by the permittee, compliance sampling data collected by Ohio EPA, and any other data submitted by the permittee, such as priority pollutant scans required by the NPDES application or by pretreatment, or other special conditions in the NPDES permit. The sources of effluent data used in this evaluation are as follows:

Self-monitoring data (DMR)	June 2018 through October 2023
Pretreatment data	2018-2022
Ohio EPA compliance sampling data	2022

Statistical Outliers and Other Non-representative Data

The data were examined, and the following values were removed from the evaluation as non-representative data:

- Metal monitoring from 9/5/2022 was excluded, the data collected at this date appeared to occur during an upset condition.
- Zinc data prior to July 2019 was excluded, a source from an industry was removed from the influent after this date.

This data is evaluated statistically, and PEQ values are calculated for each pollutant. Average PEQ (PEQ_{avg}) values represent the 95th percentile of monthly average data, and maximum PEQ (PEQ_{max}) values represent the 95th percentile of all data points (see Table 10). See Modeling Guidance #1 for more information on PEQ calculations, available through the Ohio EPA, Division of Surface Water website at:

<https://www.epa.ohio.gov/portals/35/guidance/model1.pdf>

The PEQ values are used according to Ohio rules to compare to applicable WQS and allowable WLA values for each pollutant evaluated. Initially, PEQ values are compared to the applicable average and maximum WQS. If both PEQ values are less than 25 percent of the applicable WQS, the pollutant does not have the reasonable potential to cause or contribute to exceedances of WQS, and no WLA is done for that parameter. If either PEQ_{avg} or PEQ_{max} is greater than 25 percent of the applicable WQS, a WLA is conducted to determine whether the parameter exhibits reasonable potential and needs to have a limit or if monitoring is required (see Table 13).

Wasteload Allocation

For those parameters that require a WLA, the results are based on the uses assigned to the receiving waterbody in OAC 3745-1. Dischargers are allocated pollutant loadings/concentrations based on the Ohio WQS (OAC 3745-1). Most pollutants are allocated by a mass-balance method because they do not break down in the receiving water. By rule, mixing zones are not authorized for pollutants, such as mercury, which have been designated as bioaccumulative chemicals of concern (BCCs). For BCCs, the WLA is set equal to the respective WQS value.

The methodology employed generally depends on whether the facility is considered a direct discharger to a (1) free-flowing receiving water/stream or (2) non-flowing receiving water/Lake. For free-flowing streams, WLAs for both average and maximum criteria are performed using the following general equation:

$$\text{Discharger WLA} = (\text{Downstream Flow} \times \text{WQS}) - (\text{Upstream Flow} \times \text{Background Concentration}).$$

Discharger WLAs are divided by the discharge flow so that the allocations are expressed as concentrations.

The applicable waterbody uses for this facility's discharge and the associated stream design flows are as follows:

Aquatic life (Warmwater Habitat)

Toxics (metals, organics, etc.)	Average	Annual 7Q10
	Maximum	Annual 1Q10
Ammonia	Average	Summer 30Q10
		Winter 30Q10
Agricultural Water Supply		Harmonic mean flow
Human Health (nondrinking)		Harmonic mean flow

Allocations are developed using a percentage of stream design flow as specified in Table 14, and allocations cannot exceed the Inside Mixing Zone Maximum (IMZM) criteria.

The data used in the WLA are listed in Table 13 and Table 14. The WLA results to maintain all applicable criteria are presented in Table 15.

Whole Effluent Toxicity Wasteload Allocation

Whole effluent toxicity (WET) is the total toxic effect of an effluent on aquatic life measured directly with a toxicity test. Acute WET measures short term effects of the effluent while chronic WET measures longer term and potentially more subtle effects of the effluent. WQC for WET are 0.3 TUa for acute toxicity and 1.0 TUc for chronic toxicity (OAC 3745-1-44).

There are two separate reasonable potential procedures in Ohio - one for the Lake Erie watershed and one for the Ohio River watershed. Dischargers in the Ohio River watershed are assessed using OAC 3745-33-07(B). Dischargers in the Lake Erie watershed are assessed in accordance with the “Great Lakes Water Quality Initiative Implementation Procedures” contained in 40 CFR Part 132, Appendix F, Procedure 6.

The WLA calculations for WET are similar to those for aquatic life criteria - using the chronic toxicity unit (TUc) and 7Q10 flow for the average and the acute toxicity unit (TUa) and 1Q10 flow for the maximum. WET WLAs are based on meeting the values of 0.3 TUa and 1.0 TUc downstream of the discharge and include any available dilution. These values are the levels of effluent toxicity that should not cause instream toxicity during critical low-flow conditions. WLAs for acute toxicity are capped at 1.0 TUa unless the discharger demonstrates that an Area-of-Initial-Mixing (AIM) exists under OAC 3745-1-06, or that one of the factors in OAC 3745-33-07(B)(5)-(9) allows a higher TUa limit to be granted. For the purposes of establishing WET limitations, the values of 1.0 TUa and 1.0 TUc are the most restrictive limitations that can be applied in NPDES permits [OAC 3745-33-07(B)(10)].

For Marion WPC, the WLA values for outfall 001 are 0.3 TUa and 1.0 TUc.

The chronic toxicity unit (TUc) is defined as 100 divided by the estimate of the effluent concentration which causes a 25% reduction in growth or reproduction of test organisms (IC25):

$$TUc = 100/IC25$$

This equation applies outside the mixing zone for warmwater, modified warmwater, exceptional warmwater, coldwater, and seasonal salmonid use designations except when the following equation is more restrictive (Ceriodaphnia dubia only):

$$TUc = 100/\text{geometric mean of No Observed Effect Concentration and Lowest Observed Effect Concentration}$$

The acute toxicity unit (TUa) is defined as 100 divided by the concentration in water having 50% chance of causing death to aquatic life (LC50) for the most sensitive test species:

$$TUa = 100/LC50$$

This equation applies outside the mixing zone for all designated waters. Based on the above, a value of 1.0 TUa is the lowest value that can be calculated using the equation. TUa values between 0.2 and 1.0 are based on an interpolation of toxic effects where an LC50 cannot be identified.

When the acute WLA is less than 1.0 TUa, it may be defined as a ratio of the stream dilution to the effluent flow:

Acute Dilution Ratio (downstream flow to discharger flow)	Allowable Effluent Toxicity (percent effects in 100% effluent)
up to 2 to 1	30
greater than 2 to 1 but less than 2.7 to 1	40
2.7 to 1 to 3.3 to 1	50

$$\text{Acute Dilution Ratio} = \frac{1Q10 + [\text{WWTP flow rate}]}{[\text{WWTP flow rate}]} = \frac{0 \text{ cfs} + 16.2 \text{ cfs}}{16.2 \text{ cfs}} = 1$$

The acute WLA for Marion WPC can be expressed as 30 percent mortality in 100 percent effluent based on the dilution ratio of 1 to 1. If the acute dilution ratio is less than 3.3 to 1.0, and there is evidence that effluent values between 0.3 TUa and 1.0 TUa cause or contribute to violations of WQS, the permittee may be required to investigate and remediate toxicity in this range.

REASONABLE POTENTIAL/EFFLUENT LIMITS/MANAGEMENT DECISIONS

After appropriate effluent limits are calculated, the reasonable potential of the discharger to violate the WQS must be determined. Each parameter is examined and placed in a defined "group". Parameters that do not have a WQS or do not require a WLA based on the initial screening are assigned to either group 1 or 2. For the allocated parameters, the preliminary effluent limits (PEL) based on the most restrictive average and maximum WLAs are selected from Table 15. The average PEL (PEL_{avg}) is compared to the average PEQ (PEQ_{avg}) from Table 10, and the PEL_{max} is compared to the PEQ_{max}. Based on the calculated percentage of the allocated value [(PEQ_{avg} ÷ PEL_{avg}) X 100, or (PEQ_{max} ÷ PEL_{max}) X 100], the parameters are assigned to group 3, 4, or 5. The groupings are listed in Table 16.

The final effluent limits are determined by evaluating the groupings in conjunction with other applicable rules and regulations. Table 17 presents the final effluent limits and monitoring requirements proposed for Marion WPC outfall 001 and the basis for their recommendation. Unless otherwise indicated, the monitoring frequencies proposed in the permit are continued from the existing permit.

Total Suspended Solids, 5-Day Carbonaceous Oxygen Demand, Dissolved Oxygen, and Ammonia

The limits proposed for dissolved oxygen (DO), total suspended solids (TSS), 5-day carbonaceous biochemical oxygen demand (CBOD₅), and ammonia are all based on plant design criteria. The plant design limits were included in PTI number 03-7365 from 1993 that included upgrades to the chlorination and dechlorination treatment system. These limits are protective of WQS. The TSS and CBOD₅ limits are more stringent than the Secondary Treatment Standards in 40 CFR Part 133. The current ammonia limits have been evaluated using the WLA procedures and are protective of WQS for ammonia toxicity. The current dissolved oxygen limit is protective of WQS.

Total Residual Chlorine

The existing daily effluent limit for total residual chlorine is proposed to continue as a plant design value which is based on protection of the inside mixing zone maximum (IMZM) and outside mixing zone maximum (OMZM) PELs. The most stringent daily maximum criterion is applied and is to be met anytime chlorine is being utilized for effluent disinfection. The limit has been evaluated using the WLA procedures and determined to be protective of WQS for chlorine toxicity.

Nitrite+Nitrate, and Total Kjeldahl Nitrogen

Based on best technical judgment (BTJ), monitoring is recommended for, nitrite+nitrate, and total kjeldahl nitrogen. The Little Scioto River is listed as impaired for aquatic life usage. Nutrients and organic enrichment/dissolved oxygen are listed as causes of impairment and CSOs are listed as a source of impairment. The purpose of the monitoring is to maintain a nutrient data set for use in any future TMDL studies.

Oil and Grease, pH, and *Escherichia coli*

Limits proposed for oil and grease, pH, and *Escherichia coli* are based on WQS (OAC 3745-1-35 and 37). Primary contact recreation *E. coli* standards apply to the Little Scioto River.

Bis(2-ethylhexyl) phthalate, Dibenz(a,h) anthracene, Silver, and Zinc

The Ohio EPA risk assessment (Table 16) places bis(2-ethylhexyl) phthalate, dibenz(a,h) anthracene, silver, and zinc in group 5. This placement, as well as the data in Table 9 and Table 10, indicates that the reasonable potential to exceed WQS exists and limits are necessary to protect water quality. For these parameters, the PEQ is greater than 100 percent of the WLA or the PEQ is between 75 and 100 percent of the WLA and certain conditions exist that increase the risk to the environment. Pollutants that meet this requirement must have permit limits under OAC 3745-33-07(A)(1). A compliance schedule is proposed to meet the effluent limits for bis(2-ethylhexyl) phthalate, dibenz(a,h) anthracene, and silver. A compliance schedule is not proposed for Zinc, based on the evaluation of EDMR data it is believed that the lower Zinc limits will be able to be met.

Bromodichloromethane, Total Filterable Residue, and Selenium

The Ohio EPA risk assessment (Table 16) places bromodichloromethane, total filterable residue, and selenium in group 4. This placement, as well as the data in Table 9 and Table 10, support that these parameters do not have the reasonable potential to contribute to WQS exceedances, and limits are not necessary to protect water quality. Monitoring for Group 4 pollutants (where PEQ exceeds 50 percent of the WLA) is required by OAC 3745-33-07(A)(2). Limits for total filterable residue are proposed to be removed but monitoring will continue.

Cadmium, Chromium, Dissolved Hexavalent Chromium, Copper, Free Cyanide, Lead, Mercury, and Nickel

The Ohio EPA risk assessment (Table 16) places cadmium, chromium, dissolved hexavalent chromium, copper, free cyanide, lead, mercury and nickel in groups 2 and 3. This placement, as well as the data in Table 9 and Table 10, support that these parameters do not have the reasonable potential to contribute to WQS exceedances, and limits are not necessary to protect water quality. Monitoring is proposed to document that these pollutants continue to remain at low levels. Limits for free cyanide are proposed to be removed but monitoring will continue.

Antimony, Arsenic, Barium, Chloroform, Dibromochloromethane, 1,4-Dichlorobenzene, Methyl ethyl ketone, Molybdenum, Strontium, Toluene, Methylene Chloride, and 1,3,5 Trimethylbenzene.

The Ohio EPA risk assessment (Table 16) places antimony, arsenic, barium, chloroform, dibromochloromethane, 1,4-dichlorobenzene, methyl ethyl ketone, molybdenum, strontium, toluene, methylene chloride, and 1,3,5 trimethylbenzene in groups 2 and 3. This placement, as well as the data in Table 9 and Table 10, support that these parameters do not have the reasonable potential to contribute to WQS exceedances, and limits are not necessary to protect water quality. No new monitoring is proposed. Monitoring for barium and strontium are proposed to be removed. Data for these parameters will be available for future reasonable potential analyses through pretreatment program monitoring.

Temperature and Flow Rate

Monitoring for these parameters is proposed to continue to evaluate the performance of the treatment plant.

Dissolved Orthophosphate and Total Phosphorus

Monitoring for dissolved orthophosphate (as P) and total phosphorus is required by ORC 6111.03. This monitoring will further develop nutrient datasets that are used in stream and watershed assessments and studies. Because Ohio EPA monitoring, as well as other in-stream monitoring, for dissolved orthophosphate is taken by grab sample, grab samples are proposed for orthophosphate to maintain consistent data. The grab samples must be filtered within 15 minutes of collection using a 0.45-micron filter. The filtered sample must be analyzed within 48 hours.

Bis(2-ethylhexyl) phthalate, Bromodichloromethane, and Dibenz(a,h) anthracene

Bis(2-ethylhexyl) phthalate, bromodichloromethane, dibenz(a,h) anthracene are carcinogens, which require the evaluation of the additive effect of these pollutants. OAC 3745-33-07(A)(8) states that a pollutant may be removed from the consideration of additivity if the PEL for the pollutant is less than the quantification level for that pollutant. For bis(2-ethylhexyl) phthalate and dibenz(a,h) anthracene, the average PELs are less than the respective quantification levels, so these parameters removed from additivity consideration. As a result, there is no additive effect and carcinogenic additivity is not proposed for inclusion in the permit.

Whole Effluent Toxicity Reasonable Potential

Based on evaluating the WET data presented in Table 11 and Attachment 1, and other pertinent data under the provisions of OAC 3745-33-07(B), the Marion WPC is placed in Category 3 with respect to WET. No limits are proposed, but increased testing is proposed for the duration of the permit.

Additional Monitoring Requirements

Monitoring for temperature, pH, and dissolved oxygen is proposed to be removed from the 801 upstream monitoring station because this data is currently not needed for the reasonable potential analysis. Monitoring for nitrate & nitrite is proposed to be added at stations 801 and 901 so that nutrient data is collected for future studies.

Monitoring requirements are proposed to be removed for total suspended solids and 5-day carbonaceous biochemical oxygen demand (CBOD₅) from the combined sewer overflow monitoring tables because this data is not needed to characterize the overflows.

Additional monitoring requirements proposed at the final effluent, influent and upstream/downstream stations are included for all facilities in Ohio and vary according to the type and size of the discharge. In addition to permit compliance, this data is used to assist in the evaluation of effluent quality and treatment plant performance and for designing plant improvements and conducting future stream studies.

Sludge

Limits and monitoring requirements proposed for the disposal of sewage sludge by the following management practices are based on OAC 3745-40: land application, removal to sanitary landfill or transfer to another facility with an NPDES permit.

OTHER REQUIREMENTS

Compliance Schedule

Pretreatment Local Limits Review - A 6-month compliance schedule is proposed for the City to submit a technical justification for either revising its local industrial user limits or retaining its existing local limits. If revisions to local limits are required, the City must also submit a pretreatment program modification request. Details are in Part I.C of the permit.

Effluent limits – A 36 month compliance schedule is proposed to meet the final effluent limits for. Details are in Part I.C of the permit

Combined Sewer Overflow LTCP – The schedule to implement the phases of the LTCP will be carried over in this permit. Details are in Part I.C of the permit.

Sanitary Sewer Overflow Reporting

Provisions for reporting SSOs are again proposed in this permit. These provisions include: the reporting of the system-wide number of SSO occurrences on monthly operating reports; telephone notification of Ohio EPA and the local health department, and 5-day follow up written reports for certain high risk SSOs; and preparation of an annual report that is submitted to Ohio EPA and made available to the public. Many of these provisions were already required under the “Noncompliance Notification”, “Records Retention”, and “Facility Operation and Quality Control” general conditions in Part III of Ohio NPDES permits.

Operator Certification and Operator of Record

Operator certification requirements have been included in Part II of the permit in accordance with rules effective on August 15, 2018 (OAC 3745-7). These rules require the Marion WPC to have a Class IV wastewater treatment plant operator in charge of the sewage treatment plant operations discharging through outfall 001. These rules also require the permittee to designate one or more operator of record to oversee the technical operation of the treatment works and sewerage system.

Method Detection Limit Reporting

When submitting monitoring results in eDMR, the permittee must report all detected concentration values above the method detection limit (MDL), even if that value is below the quantification level. A detection above the MDL indicates the presence of a pollutant with strong confidence, which must be considered in reasonable potential analyses. Per OAC 3745-33-07(C)(2)(c), for the purpose of assessing compliance, any value reported below the quantification level shall be considered in compliance with an effluent limit.

Outfall Signage

Part II of the permit includes requirements for the permittee to place and maintain a sign at each outfall to the Little Scioto River providing information about the discharge. Signage at outfalls is required pursuant to OAC 3745-33-08(A).

Part III

Part III of the permit details standard conditions that include monitoring, reporting requirements, compliance responsibilities, and general requirements.

Stormwater Compliance

To comply with industrial stormwater regulations, the permittee requested coverage under the industrial stormwater general permit. Permit 2GR00549*GG became effective on 9/1/2022. No later than 90 days after the effective date of the renewed general permit, the permittee must request renewed coverage under the industrial storm water general permit or make other provisions to comply with the industrial storm water regulations.

Figure 1. Location of Marion WPC



Figure 2. Diagram of Wastewater Treatment System

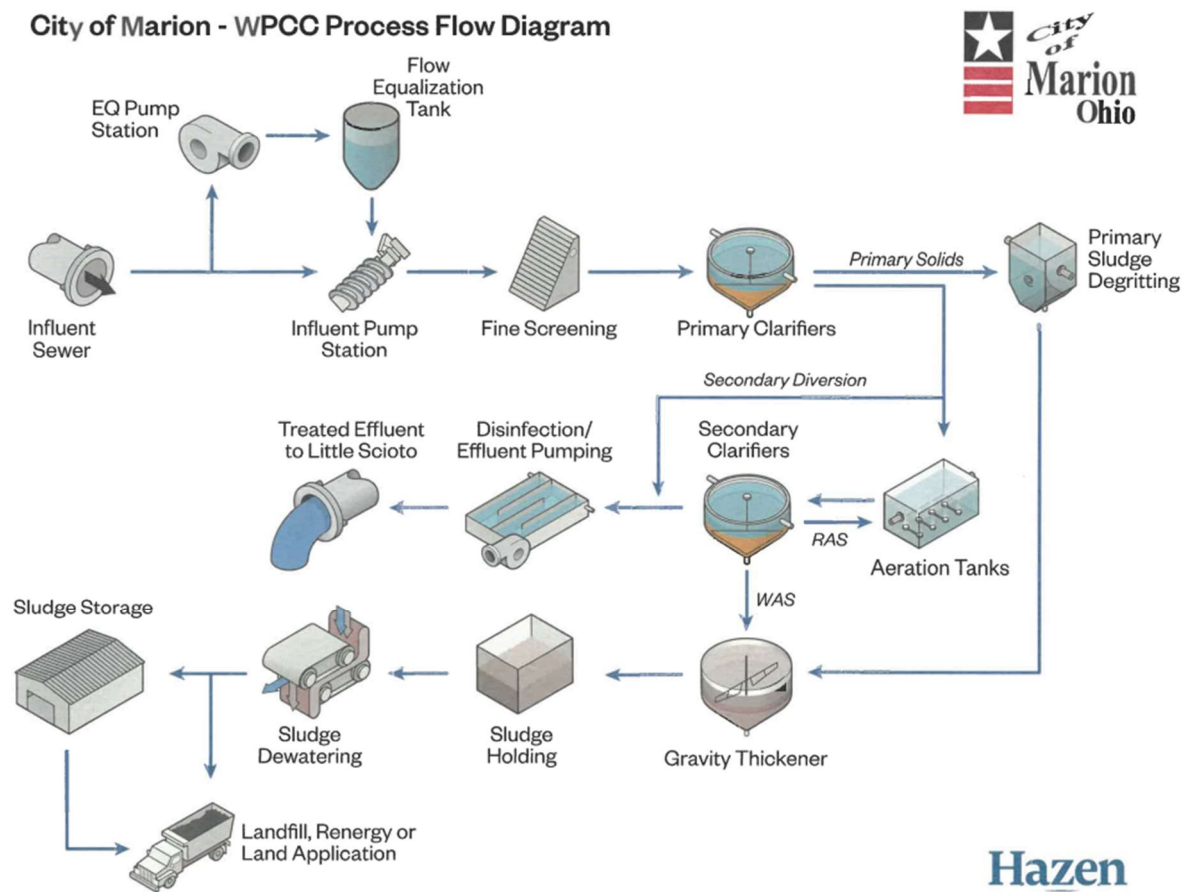


Table 1. Sewage Sludge Removal

Year	Dry Tons Removed
2018	2700
2019	1730
2020	1790
2021	1540
2022	1590
2023	1628

Table 2. Effluent Violations for Outfall 001

PARAMETER	2018 ^a	2019	2020	2021	2022	2023 ^b	Total
Chlorine, Total Residual	0	0	0	17	7	2	26
Dissolved Oxygen	11	40	23	12	0	1	87
E. coli	2	1	4	0	0	0	7
Nitrogen, Ammonia (NH3)	0	1	0	1	0	0	2
Total Suspended Solids	0	3	0	1	1	0	5
Zinc	0	5	0	0	0	0	5
pH, Minimum	0	0	1	33	0	0	34
Total	13	50	28	64	8	3	166

^a = data set begins on 6/1/18^b = data set ends on 10/31/23**Table 3. Average Annual Effluent Flow Rates**

Flow Rate (Million Gallons per Day)					
Year	# obs	Average	Median	95th Percentile	Maximum
2018 ^a	214	9.0	7.4	17.3	27.9
2019	360	10.4	8.6	23.9	28.8
2020	366	9.9	9.0	19.5	27.2
2021	365	9.3	7.5	20.0	36.0
2022	365	8.9	7.0	20.3	34.4
2023 ^b	304	8.0	6.4	19.6	33.4

^a = data set begins on 6/1/18^b = data set ends on 10/31/23**Table 4. Sanitary Sewer Overflow Discharges**

Year	Number of SSOs
2018 ^a	6
2019	13
2020	25
2021	12
2022	11
2023 ^b	0

^a = data set begins on 6/1/18^b = data set ends on 10/31/23

Table 5. Bypass Discharges

Outfall	Year	Days with bypass flow	Annual Bypass Volume (MG)	Median Bypass Volume (MG)	Median TSS (mg/L)	Median CBOD (mg/L)
603	2018 ^a	9	24	2	52	33
603	2019	32	88	1	56	37
603	2020	18	61	2	73	51
603	2021	25	102	4	112	38
603	2022	5	13	3	55	35
603	2023 ^b	2	0.2	0.1	56	37

^a = data set begins on 6/1/18^b = data set ends on 10/31/23**Table 6. Combined Sewer Overflow Discharges**

Station No.	Occurrences						Volume (MG)					
	2018 ^a	2019	2020	2021	2022	2023 ^b	2018 ^a	2019	2020	2021	2022	2023 ^b
003	25	45	46	42	41	33	9.8	81.1	103.4	143.4	211.8	6.8
004	28	46	46	55	46	41	58.9	117.2	103.6	101.3	263.7	36.5
005	--	--	--	3	22	13	--	--	--	0.09	7.2	4.1

^a = data set begins on 6/1/18^b = data set ends on 10/31/23**Table 7. Calculated Annual Total Phosphorus Loadings**

Year	Median Phosphorus (mg/L)	Median Flow (MGD)	Median Loading (kg/day)
2018 ^a	1.79	7.4	50
2019	1.72	8.6	56
2020	1.52	9.0	52
2021	2.22	7.5	63
2022	2.10	7.0	56
2023 ^b	2.61	6.4	63

^a = data set begins on 6/1/18^b = data set ends on 10/31/23

MGD = million gallons per day

Table 8. Effluent Characterization Using Pretreatment and Ohio EPA Data

Parameter	Ohio EPA	Ohio EPA	PT	PT	PT	PT	PT
	3/28/2023	5/16/2023	7/26/2018	5/9/2019	6/22/2020	7/21/2021	7/13/2022
Antimony	0.74	0.808	AA (5)	AA (5)	2	AA (5)	AA (5)
Arsenic	1.53	1.87	AA (5)	AA (5)	1	AA (5)	AA (5)
Cadmium	0.043	0.0325	AA (3)	AA (3)	AA (0.1)	AA (3)	AA (3)
Chromium	0.875	1.34	AA (7)	AA (7)	2	AA (7)	AA (7)
Copper	2.83	3.3	AA (8)	AA (8)	4	AA (8)	AA (8)
Lead	0.307	0.269	AA (10)	AA (10)	AA (0.1)	AA (10)	AA (10)
Nickel	8.3	9.69	20	11	10	17	15
Selenium	1.59	0.778	AA (4)	AA (4)	1	AA (4)	AA (4)
Silver	0.06	AA (0.01)	AA (5)	AA (5)	AA (0.4)	AA (5)	AA (5)
Strontium	1620	3100	NT	NT	NT	NT	NT
Zinc	36.1	48.5	345	315	83	77	71
Nitrate + Nitrite (mg/L)	9.36	14.5	NT	NT	NT	NT	NT
Molybdenum	NT	NT	AA (20)	AA (20)	20	AA (20)	AA (20)
Chloroform	0.683	3.88	AA (5)	AA (5)	0.7	AA (5)	AA (5)
Acetone	AA (0.545)	2.51	NT	NT	NT	NT	NT
Butylbenzene, tert-	0.448	AA (0.207)	NT	NT	NT	NT	NT
Chlorodibromomethane	AA (0.15)	0.74	AA (5)	AA (5)	AA (0.4)	AA (5)	AA (5)
Dibenzo[a,h]anthracene	AA (1.77)	1.93	AA (10)	AA (10)	AA (1.37)	AA (10)	AA (10)
Dichlorobenzene, 1,4-	0.536	AA (0.277)	AA (5)	AA (5)	AA (0.5)	AA (5)	AA (5)
Dichlorobromomethane	0.589	1.78	AA (5)	AA (5)	AA (0.4)	AA (5)	AA (5)
Methyl ethyl ketone	AA (0.511)	0.647	NT	NT	NT	NT	NT
Methyl tertiary butyl ether (MTBE)	0.939	AA (0.644)	NT	NT	NT	NT	NT
Methylene chloride	0.608	AA (0.303)	AA (10)	AA (10)	AA (0.6)	AA (10)	AA (10)
Toluene	2.6	0.63	AA (5)	AA (5)	AA (0.4)	AA (5)	AA (5)
Trihalomethanes (unspecified mix)	1.27	6.41	NT	NT	NT	NT	NT
Trimethylbenzene, 1,3,5-	0.443	AA (0.182)	NT	NT	NT	NT	NT
Bis (2-ethylhexyl) Phthalate	AA (1.71)	AA (1.79)	AA (5)	AA (5)	AA (1.1)	AA (5)	AA (5)

Units in µg/L, unless otherwise noted

PT = pretreatment

AA = not-detected (analytical method detection limit)

Table 9. Effluent Characterization Using Self-Monitoring Data

Parameter	Unit	Current Limits		# Obs	Percentiles		Data Range
		30 Day	Daily		50th	95th	
Water Temperature	°C	Monitoring Only		1963	18.7	27.6	9.4 - 30
Dissolved Oxygen	mg/L	--	5.0 ^m	1935	7.4	5.1*	0 - 11.4
Total Suspended Solids	kg/day	477	715 ^w	1256	84.6	430	0 - 3590
Total Suspended Solids	mg/L	12	18 ^w	1261	2.8	8	0 - 61
Oil and Grease	mg/L	--	10	152	--	--	< 5
Nitrogen, Ammonia - Summer	kg/day	40	60 ^w	673	2.78	51.2	0 - 224
Nitrogen, Ammonia - Summer	mg/L	1.0	1.5 ^w	678	.11	1.47	0 - 4.44
Nitrogen, Ammonia - Winter	kg/day	100	159 ^w	574	2.78	62.1	0 - 416
Nitrogen, Ammonia - Winter	mg/L	2.5	4.0 ^w	574	.0718	1.18	0 - 9.14
Nitrogen Kjeldahl, Total	mg/L	Monitoring Only		66	1.7	4.24	0 - 7.4
Nitrite Plus Nitrate, Total	mg/L	Monitoring Only		65	9.16	15.2	3.4 - 22.8
Phosphorus, Total	mg/L	Monitoring Only		229	1.95	4.22	.0626 - 6.08
Orthophosphate, Dissolved	mg/L	Monitoring Only		66	1.81	4.87	.079 - 35.8
Barium, TR	µg/L	Monitoring Only		63	30.2	40.8	15.9 - 43
Nickel, TR	µg/L	Monitoring Only		63	9	18.9	0 - 42.1
Silver, TR	µg/L	Monitoring Only		63	< 1	< 1	0 - 1.72
Strontium, TR	µg/L	Monitoring Only		63	2270	3700	1000 - 4260
Zinc, TR - All	kg/day	--	12	58	1.98	10.7	.32 - 18.3
Zinc, TR - All	µg/L	--	300	59	66	234	16.6 - 418
Zinc, TR - Quarterly	µg/L	Monitoring Only		4	322	375	206 - 378
Cadmium, TR	µg/L	Monitoring Only		63	< 2	< 2	0 - 42.8
Lead, TR	µg/L	Monitoring Only		63	< 2	1.65	0 - 38.5
Chromium, TR	µg/L	Monitoring Only		63	< 5	< 5	0 - 37.7
Copper, TR	µg/L	Monitoring Only		63	< 5	6.01	0 - 48.1
Chromium, Dissolved Hexavalent	µg/L	Monitoring Only		59	--	--	< 4
E. coli	#/100 mL	126	284 ^w	1061	26	816	0 - 2420
Bis(2-ethylhexyl) Phthalate	µg/L	Monitoring Only		65	< 5	< 5	0 - 4.9
Flow Rate	MGD	Monitoring Only		1974	7.68	20.2	2.38 - 36
Chlorine, Total Residual	mg/L	--	0.019	1073	< .01	< .01	0 - 1.47
Mercury, Total	kg/day	0.0005	0.012	11	.00002	.0000823	0 - .0000866

Parameter	Unit	Current Limits		# Obs	Percentiles		Data Range
		30 Day	Daily		50th	95th	
Mercury, Total - 2018-2019	ng/L	12	300	11	.609	1.17	0 - 1.5
Mercury, Total - 2019-2023	ng/L	Monitoring Only		55	.765	1.76	0 - 2.68
Cyanide, Free (Low-Level) - All	kg/day	0.48	1.84	55	< .0647	.0975	0 - .368
Cyanide, Free (Low-Level) - All	µg/L	12	46	55	< 3	5.21	0 - 10
Cyanide, Free (Low-Level) - Quarterly	µg/L	Monitoring Only		4	--	--	< 3
Acute Toxicity, Ceriodaphnia dubia	TUa	Monitoring Only		5	--	--	< .2
Chronic Toxicity, Ceriodaphnia dubia	TUc	Monitoring Only		5	< 1	1.84	0 - 2.3
Acute Toxicity, Pimephales promelas	TUa	Monitoring Only		6	< .2	1.03	0 - 1.3
Chronic Toxicity, Pimephales promelas	TUc	Monitoring Only		6	< 1	1.35	0 - 1.8
pH, Maximum	S.U.	--	9.0	1876	7.58	8.02	6.56 - 8.89
pH, Minimum	S.U.	--	6.5 ^m	1876	7.35	6.88*	6.08 - 8.71
Residue, Total Filterable	kg/day	59700	--	152	20000	42500	4910 - 70800
Residue, Total Filterable	mg/L	1500	--	152	650	879	230 - 1400
CBOD 5 day	kg/day	398	596 ^w	1110	55.9	208	0 - 2180
CBOD 5 day	mg/L	10	15 ^w	1115	2	4	0 - 27

* = For minimum pH, 5th percentile shown in place of 50th percentile.

** = For dissolved oxygen, 5th percentile shown in place of 95th percentile.

^a = weekly average.

^m = minimum limit

Table 10. Projected Effluent Quality for Outfall 001

Parameter	Units	Number of Samples	Number > MDL	PEQ Average	PEQ Maximum
Ammonia (Summer)	mg/L	471	441	0.85	1.8
Ammonia (Winter)	mg/L	296	257	0.7	1.5
Antimony	µg/L	3	3	4.38	6
Arsenic - TR	µg/L	3	3	4.10	5.61
Barium	µg/L	63	63	38.6	47.9
Bis(2-ethylhexyl) phthalate	µg/L	68	1	3.65	5
Bromodichloromethane	µg/L	3	2	3.90	5.34
tert-Butylbenzene	µg/L	2	1	1.24	1.70
Cadmium - TR	µg/L	2	2	0.12	0.16
Chloroform (Trichloromethane)	µg/L	7	3	7.3	10
Chromium - TR	µg/L	65	3	3.65	5
Hexavalent Chromium (Dissolved)	µg/L	59	0	--	--
Copper - TR	µg/L	69	13	4.6	7.2
Cyanide, Free	µg/L	59	5	2	7.4
Dibenz(a,h)anthracene	µg/L	3	1	4.22	5.79
Dibromochloromethane	µg/L	3	1	1.62	2.22
1,4-Dichlorobenzene	µg/L	3	1	1.17	1.61
Total Filterable Residue	mg/L	152	152	793	940
Lead - TR	µg/L	59	5	2.20	3.01
Mercury	ng/L	66	53	1.4	2.1
Methyl ethyl ketone	µg/L	2	1	1.79	2.46
Molybdenum	µg/L	5	1	33.6	46
Nickel - TR	µg/L	69	50	15.5	21.7
Nitrate-N + Nitrite-N	mg/L	67	67	14.3	19.4
Selenium - TR	µg/L	3	3	3.48	4.77
Silver	µg/L	50	4	1.25	1.72
Strontium	µg/L	65	65	3184	4098
Toluene	µg/L	3	2	5.69	7.8
Zinc - TR	µg/L	62	62	148	224
Methylene chloride (Dichloromethane)	µg/L	3	1	1.33	1.82
1,3,5-Trimethylbenzene	µg/L	2	1	1.23	1.68
Chlorine, Total Residual	mg/L	1073	30	0.54	0.74

MDL = analytical method detection limit

PEQ = projected effluent quality

* Per OAC 3745-2-04(E)(3), ammonia PEQ is based on data collected during the following months:

Summer – June through September

Winter – December through February

Table 11. Summary of Acute and Chronic Toxicity Results

Date	<i>Ceriodaphnia dubia</i>		<i>Pimephales promelas</i>	
	Acute (TU _a)	Chronic (TU _c)	Acute (TU _a)	Chronic (TU _c)
7/1/2018	AA (0.2)	AA (1.0)	AA (0.2)	AA (1.0)
7/1/2019	AA (0.2)	AA (1.0)	AA (0.2)	AA (1.0)
7/1/2020	AA (0.2)	AA (1.0)	AA (0.2)	AA (1.0)
7/1/2021	AA (0.2)	2.3	1.3	1.8
7/26/2022	AA (0.2)	AA (1.0)	AA (0.2)	AA (1.0)
7/25/2023	AE ()	AE ()	.2	AA (1.0)
8/28/2023	AA (0.2)	AA (1.0)	--	--

AA = non-detection; analytical method detection limit of 0.2 TU_a, 1.0 TU_c

AE = test not valid

TU_a = acute toxicity unit

TU_c = chronic toxicity unit

Table 12. Use Attainment Table

Location	RM	Use	Status	Cause	Source
Little Scioto River at Marion, upstream of Marion WPC, downstream of Rockswale Ditch	6.50	MWH-C	PARTIAL	Organic Enrichment/ dissolved oxygen Habitat alterations	CSOs Channelization
Little Scioto River at landfill, Township Road 97-A	6.24	MWH-C	PARTIAL	Organic Enrichment/ dissolved oxygen Habitat alterations	CSOs Channelization
Little Scioto River at Green Camp, at Owens-Green Camp Road	0.39	MWH-C	NON	Sediment contamination, chronic ammonia	CSOs Creosote

Data gathered from Table 2, *Biological and Water Quality Study of the Upper Scioto River 2009 & 2011*

MWH-C = Modified warmwater habitat (channelized)

Table 13. Water Quality Criteria in the Study Area

Parameter	Units	Outside Mixing Zone Criteria				Inside Mixing Zone Maximum
		Average			Maximum Aquatic Life	
		Human Health	Agri-culture	Aquatic Life		
Ammonia (Summer)	mg/L	--	--	2.7	--	--
Ammonia (Winter)	mg/L	--	--	4.8	--	--
Antimony	µg/L	640	--	190	900	1800
Arsenic - TR	µg/L	--	100	150	340	680
Barium	µg/L	--	--	1500	6300	13000
Bis(2-ethylhexyl)phthalate	µg/L	3.7 ^c	--	8.4	1100	2100
Bromodichloromethane	µg/L	5.6 ^c	--	--	--	--
tert-Butylbenzene	µg/L	--	--	--	--	--
Cadmium - TR	µg/L	--	50	5.2	13	27
Chloroform (Trichloromethane)	µg/L	20000 ^c	--	140	1300	2600
Chromium - TR	µg/L	--	100	190	3900	7900
Hexavalent Chromium (Dissolved)	µg/L	--	--	11	16	31
Copper - TR	µg/L	--	500	21	34	69
Cyanide, Free	µg/L	400	--	12	46	92
Dibenz(a,h)anthracene	µg/L	0.0013 ^c	--	--	--	--
Dibromochloromethane	µg/L	210 ^c	--	--	--	--
1,4-Dichlorobenzene	µg/L	900	--	9.4	57	110
Total Filterable Residue	mg/L	--	--	1500	--	--
Lead - TR	µg/L	--	100	22	410	830
Mercury	ng/L	12	10000	910	1700	3400
Methyl ethyl ketone	µg/L	--	--	22000	200000	400000
Molybdenum	µg/L	--	--	20000	190000	370000
Nickel - TR	µg/L	4600	200	120	1100	2100
Nitrate-N + Nitrite-N	mg/L	--	100	--	--	--
Selenium - TR	µg/L	4200	50	5	62	120
Silver	µg/L	--	--	1.3	8.3	17
Strontium	µg/L	--	--	72000	190000	380000
Toluene	µg/L	520	--	62	560	1100
Zinc - TR	µg/L	26000	25000	270	270	540
Methylene chloride (Dichloromethane)	µg/L	10000 ^c	--	1900	11000	22000
1,3,5-Trimethylbenzene	µg/L	950	--	26	230	460
Chlorine, Total Residual	mg/L	--	--	0.011	0.019	0.038

^c carcinogen

Table 14. Instream Conditions and Discharger Flow

Parameter	Units	Season	Value	Basis
Stream Flows				
1Q10	cfs	annual	0	USGS station 03218000 1938-1971
7Q10	cfs	annual	0	USGS station 03218000 1938-1971
30Q10	cfs	summer	0	USGS station 03218000 1938-1971
		winter	0.12	USGS station 03218000 1938-1971
90Q10	cfs	annual	0	USGS station 03218000 1938-1971
Harmonic Mean	cfs	annual	1.66	USGS station 03218000 1938-1971
Mixing Assumption	%	average	100	
		maximum	100	
Hardness, OMZ	mg/L	annual	260	901 Station 50th percentile n=66
Hardness, IMZ	mg/L	annual	260	901 Station 50th percentile n=66
pH	S.U.	summer	7.7	901 station 75th percentile n=38
		winter	7.8	901 station 75th percentile n=21
Temperature	°C	summer	22.5	901 station 75th percentile n=38
		winter	8.7	901 station 75th percentile n=21
Marion WPC flow	cfs	annual	16.246	NPDES Application Form 2A
Background Water Quality				
Ammonia (Summer)	mg/L		0.109	EDMR; 2018-2023; n=39; 0<MDL; 801 Station
Ammonia (Winter)	mg/L		0.132	EDMR; 2018-2023; n=20; 0<MDL; 801 Station
Antimony	µg/L		0	No representative data available.
Arsenic - TR	µg/L		1.57	OEPA; 2023; n=1; 0<MDL; Station 610750
Barium	µg/L		57	OEPA; 2023; n=1; 0<MDL; Station 610750
Bis(2-ethylhexyl)phthalate	µg/L		0	No representative data available.
Bromodichloromethane	µg/L		0	No representative data available.
tert-Butylbenzene	µg/L		0	No representative data available.
Cadmium - TR	µg/L		0.0938	OEPA; 2023; n=1; 0<MDL; Station 610750
Chloroform (Trichloromethane)	µg/L		0	No representative data available.
Chromium - TR	µg/L		2.9	OEPA; 2023; n=1; 0<MDL; Station 610750
Hexavalent Chromium (Dissolved)	µg/L		0	No representative data available.
Copper - TR	µg/L		4.49	OEPA; 2023; n=1; 0<MDL; Station 610750
Cyanide, Free	µg/L		0	No representative data available.
Dibenz(a,h)anthracene	µg/L		0	No representative data available.
Dibromochloromethane	µg/L		0	No representative data available.
1,4-Dichlorobenzene	µg/L		0	No representative data available.
Total Filterable Residue	mg/L		0	No representative data available.
Lead - TR	µg/L		2.85	OEPA; 2023; n=1; 0<MDL; Station 610750
Mercury	ng/L		0	No representative data available.
Methyl ethyl ketone	µg/L		0	No representative data available.

Parameter	Units	Season	Value	Basis
Molybdenum	µg/L		0	No representative data available.
Nickel - TR	µg/L		5.24	OEPA; 2023; n=1; 0<MDL; Station 610750
Nitrate-N + Nitrite-N	mg/L		0	No representative data available.
Selenium - TR	µg/L		0.716	OEPA; 2023; n=1; 0<MDL; Station 610750
Silver	µg/L		0	No representative data available.
Strontium	µg/L		448	OEPA; 2023; n=1; 0<MDL; Station 610750
Toluene	µg/L		0	No representative data available.
Zinc - TR	µg/L		17.9	OEPA; 2023; n=1; 0<MDL; Station 610750
Methylene chloride (Dichloromethane)	µg/L		0	No representative data available.
1,3,5-Trimethylbenzene	µg/L		0	No representative data available.
Chlorine, Total Residual	mg/L		?	No representative data available.

MDL = analytical method detection limit

n = number of samples

OEPA = Ohio Environmental Protection Agency

Table 15. Summary of Effluent Limits to Maintain Applicable Water Quality Criteria

Parameter	Units	Outside Mixing Zone Criteria				Inside Mixing Zone Maximum
		Average			Maximum Aquatic Life	
		Human Health	Agri-culture	Aquatic Life		
Ammonia (Summer)	mg/L	--	--	2.7	--	--
Ammonia (Winter)	mg/L	--	--	4.83	--	--
Antimony	µg/L	705	--	190	900	1800
Arsenic - TR	µg/L	--	110	150	340	680
Barium	µg/L	--	--	1500	6300	13000
Bis(2-ethylhexyl)phthalate	µg/L	4.1 ^c	--	8.4	1100	2100
Bromodichloromethane	µg/L	6.2 ^c	--	--	--	--
tert-Butylbenzene	µg/L	--	--	--	--	--
Cadmium - TR	µg/L	--	55	5.2	13	27
Chloroform (Trichloromethane)	µg/L	22044 ^c	--	140	1300	2600
Chromium - TR	µg/L	--	110	190	3900	7900
Hexavalent Chromium (Dissolved)	µg/L	--	--	11	16	31
Copper - TR	µg/L	--	551	21	34	69
Cyanide, Free	µg/L	441	--	12	46	92
Dibenz(a,h)anthracene	µg/L	0.0014 ^c	--	--	--	--
Dibromochloromethane	µg/L	231	--	--	--	--
1,4-Dichlorobenzene	µg/L	992	--	9.4	57	110
Total Filterable Residue	mg/L	--	--	1500	--	--
Lead - TR	µg/L	--	110	22	410	830
Mercury ^B	ng/L	12	10000	910	1700	3400
Methyl ethyl ketone	µg/L	--	--	22000	200000	400000
Molybdenum	µg/L	--	--	20000	190000	370000
Nickel - TR	µg/L	5069	220	120	1100	2100
Nitrate-N + Nitrite-N	mg/L	--	110	--	--	--
Selenium - TR	µg/L	4629	55	5	62	120
Silver	µg/L	--	--	1.3	8.3	17
Strontium	µg/L	--	--	72000	190000	380000
Toluene	µg/L	573	--	62	560	1100
Zinc - TR	µg/L	28655	27553	270	270	540
Methylene chloride (Dichloromethane)	µg/L	11022 ^c	--	1900	11000	22000
1,3,5-Trimethylbenzene	µg/L	1047	--	26	230	460
Chlorine, Total Residual	mg/L	--	--	0.011	0.019	0.038

^B Bioaccumulative Chemical of Concern (BCC); no mixing zone allowed after 11/15/2010, WQS must be met at end-of-pipe, unless requirements for an exception are met as listed in OAC 3745-2-05(A)(2)(e)(ii)

^C carcinogen

Table 16. Parameter Assessment

Group 1: Due to a lack of criteria, the following parameters could not be evaluated at this time.

tert-Butylbenzene

Group 2: PEQ < 25 percent of WQS or all data below minimum detection limit.
WLA not required. No limit recommended; monitoring optional.

Antimony	Arsenic - TR	Barium
Cadmium - TR	Chloroform	Chromium - TR
Hexavalent Chromium (Dissolved)	(Trichloromethane)	Cyanide, Free
Dibromochloromethane	Copper - TR	Lead - TR
Mercury	1,4-Dichlorobenzene	Molybdenum
Nickel - TR	Methyl ethyl ketone	Strontium
Toluene	Nitrate-N + Nitrite-N	1,3,5-
	Methylene chloride	Trimethylbenzene
	(Dichloromethane)	

Group 3: PEQ_{max} < 50 percent of maximum PEL and PEQ_{avg} < 50 percent of average PEL.
No limit recommended; monitoring optional.
No Parameters in this group

Group 4: PEQ_{max} ≥ 50 percent, but < 100 percent of the maximum PEL or
PEQ_{avg} ≥ 50 percent, but < 100 percent of the average PEL. Monitoring is appropriate.

Bromodichloromethane Total Filterable Residue Selenium - TR

Group 5: Maximum PEQ ≥ 100 percent of the maximum PEL or average PEQ ≥ 100 percent of the average PEL, or either the average or maximum PEQ is between 75 and 100 percent of the PEL and certain conditions that increase the risk to the environment are present. Limit recommended.

Limits to Protect Numeric Water Quality Criteria

Parameter	Units	Recommended Effluent Limits	
		Average	Maximum
Bis(2-ethylhexyl) phthalate	µg/L	4.1	1100
Dibenz(a,h)anthracene	µg/L	0.0014	--
Silver	µg/L	1.3	8.3
Zinc - TR	µg/L	270	270
Chlorine, Total Residual	mg/L	0.011	0.019

PEL = preliminary effluent limit

PEQ = projected effluent quality

WLA = wasteload allocation

WQS = water quality standard

Table 17. Final Effluent Limits for Outfall 001

Parameter	Units	Concentration		Loading (kg/day) ^a		Basis ^b
		Daily Maximum	30 Day Average	Daily Maximum	30 Day Average	
Water Temperature	°C	----- Monitor -----				M ^c
Dissolved Oxygen	mg/L	5.0 ^m	--	--	--	WQS
TSS	mg/L	18 ^d	12	715 ^d	477	PD
Oil & Grease	mg/L	10	--	--	--	WQS
Ammonia (summer)	mg/L	1.5 ^d	1.0	60 ^d	40	PD
Ammonia (winter)	mg/L	4.0 ^d	2.5	159 ^d	100	PD
Total Kjeldahl Nitrogen	mg/L	----- Monitor -----				M
Nitrate plus Nitrite	mg/L	----- Monitor -----				M
Phosphorus	mg/L	----- Monitor -----				PMR
Orthophosphate	mg/L	----- Monitor -----				PMR
Selenium	µg/L	----- Monitor -----				RP
Nickel	µg/L	----- Monitor -----				M
Silver	µg/L	8.3	1.3	0.33	0.052	RP
Zinc	µg/L	270	--	11	--	RP
Cadmium	µg/L	----- Monitor -----				M
Lead	µg/L	----- Monitor -----				M
Chromium	µg/L	----- Monitor -----				M
Copper	µg/L	----- Monitor -----				M
Dissolved Hexavalent Chromium	µg/L	----- Monitor -----				M
<i>E. coli</i>	#/100 mL	284 ^d	126	--	--	WQS
Bromodichloromethane	µg/L	----- Monitor -----				RP
Dibenzo (A,H) Anthracene	µg/L	--	0.0014	--	0.000056	RP
Bis(2-ethylhexyl) Phthalate	µg/L	1100	4.1	44	0.164	RP
Flow Rate	MGD	----- Monitor -----				M ^c
Chlorine	mg/L	0.019	--	--	--	PD/WLA
Mercury	ng/L	----- Monitor -----				M
Free Cyanide	µg/L	----- Monitor -----				M
Acute Toxicity, <i>Ceriodaphnia dubia</i>	TUa	----- Monitor -----				WET
Chronic Toxicity, <i>Ceriodaphnia dubia</i>	TUc	----- Monitor -----				WET
Acute Toxicity, <i>Pimephales promelas</i>	TUa	----- Monitor -----				WET
Chronic Toxicity, <i>Pimephales promelas</i>	TUc	----- Monitor -----				WET
Total Filterable Residue	mg/L	----- Monitor -----				RP
pH, maximum	SU	9.0	--	--	--	WQS
pH, minimum	SU	6.5 ^m	--	--	--	WQS
CBOD5	mg/L	15 ^d	10	596 ^d	398	PD

^a Effluent loadings based on average design discharge flow of 10.5 MGD.

^b Definitions:

M = Division of Surface Water NPDES Permit Guidance 1: Monitoring frequency requirements for Sanitary Discharges

PD = Plant Design (OAC 3745-33-05(E))

PMR = Phosphorus monitoring requirements (ORC 6111.03)

RP = Reasonable Potential for requiring water quality-based effluent limits and monitoring requirements in permits (OAC 3745-33-07(A))

WLA = Wasteload Allocation procedures (OAC 3745-2)

WQS = Ohio Water Quality Standards (OAC 3745-1)

WET = Minimum testing requirements for whole effluent toxicity [OAC 3745-33-07(B)(11)]

WQS = Ohio Water Quality Standards (OAC 3745-1)

^c Monitoring of flow and other indicator parameters is specified to assist in the evaluation of effluent quality and treatment plant performance.

^d 7 day average limit.

^m minimum limit

Attachment 1. Whole Effluent Toxicity Reasonable Potential Analysis

Whole effluent toxicity testing produced only non-detection results for acute toxicity in *Ceriodaphnia dubia*, and therefore it falls under Hazard Category 4. The reasonable potential analyses in Tables 3B, 3C, and 3D were only performed for chronic *Ceriodaphnia dubia* (TUc Cd) and *Pimephales promelas* acute (TUa Pp) and chronic toxicity (TUc Pp).

Hazard Category Summary

	<i>Ceriodaphnia dubia</i>		<i>Pimephales promelas</i>	
	Acute	Chronic	Acute	Chronic
Effluent Toxicity (Table A)	4	3	4	3
Near-Field Impact (Table B)	4		3	
Far-field Impact (Table C)		3		4
	3		3	

Hazard Categories: 1: Toxicity adequately documented 3: Toxicity possible
2: Toxicity strongly suspected 4: No toxicity

Table A. Effluent Toxicity

	<i>Ceriodaphnia dubia</i>		<i>Pimephales promelas</i>	
	Acute	Chronic	Acute	Chronic
WLA	0.3	1.0	0.3	1.0
# of tests	6	6	6	6
Maximum value	AA	2.3	1.3	1.8
Percent of tests >WLA	--	17	17	17
Geometric mean	--	1.2	0.27	1.1
Average Exceedance (Geomean * Percent of tests >WLA)	--	0.20	0.05	0.19
Average Exceedance / WLA	--	0.2	0.17	0.19

Attribute Evaluated	Hazard Category 1	Hazard Category 2	Hazard Category 3	Hazard Category 4
Degree of Toxicity	Adequately Documented	Strongly Suspected	Possible	None
(1) Minimum number of tests	3 TUc Cd TUa, TUc Pp	1	0 or 1	0 or 1
(2) Percent of tests >WLA	>30	20 to 30	10 to 20 TUc Cd TUa, TUc Pp	10
(3) Average Exceedance/WLA ¹ (Tables B and C data available)				
(a) Acute ²	> 0.5	≥ 0.3	≥ 0.3	< 0.3 TUa PP
(b) Chronic	>0.67	≥ 0.5	≥ 0.5	< 0.5 TUc Pp TUc Cd
(4) Maximum TU value (Tables 3B and 3C data available)	> WLA TUc Cd TUa, TUc Pp	≥ WLA	≥ 0.5xWLA	< 0.5xWLA

Table B. Near-Field Toxicity

Attribute Evaluated	Hazard Category 1	Hazard Category 2	Hazard Category 3	Hazard Category 4
Degree of Toxicity	Adequately Documented	Strongly Suspected	Possible	None
(1) Mortality within mixing zone ³	≥ 20%	≤ 20%	≤ 20%	< 20%
(2) Stream community impact				
(a) implied chemically ^{4, 6}	≥3xIMZM or >LC50	≥1.5xIMZM or >LC50	≥0.75xIMZM or >0.75xLC50	≤0.5xIMZM or ≤0.75xLC50 TUa Pp
(b) implied toxicologically ⁴	≥1.0 TUa	≥1.0 TUa	≥1.0 TUa TUa Pp	<1.0 TUa
(c) implied biologically	Toxic	Fair/poor community	Slight impact	None TUa Pp

Table C. Far-Field Toxicity

Attribute Evaluated	Hazard Category 1	Hazard Category 2	Hazard Category 3	Hazard Category 4
Degree of Toxicity	Adequately Documented	Strongly Suspected	Possible	None
(1) Aquatic life use impairment (Ohio EPA biological criteria)	Yes ⁵	Yes or partial ⁵	Partial	None TUc Cd, TUc Pp
(2) Stream community impact implied toxicologically ³	Significant effect	Significant effect	Unknown or slight effect	None TUc Cd, TUc Pp
(3) Other indicators	Stress indicated	Stress indicated	Stress indicated	No stress TUc Cd, TUc Pp

¹ Compare (per cent exceedances x geometric mean TU) to table factor.

² Use 0.3 x WLA for situations where AIM exists.

³ Results of ambient toxicity test are not binding or required for classification as to category but, if available, will be interpreted under the weight of evidence principle giving due consideration as to sampling location and conditions.

⁴ Based on effluent data. May not be appropriate for situations where AIM exists.

⁵ Lack of attainment due to toxic, complex or unidentifiable type of impact.

⁶ The LC50-based criteria are used only for pollutant parameters that do not have numeric criteria.

Attachment 2. Acronyms

ABS	Anti-backsliding
BPJ	Best professional judgment
CFR	Code of Federal Regulations
CMOM	Capacity Management, Operation, and Maintenance
CONSWLA	Conservative substance wasteload allocation
CSO	Combined sewer overflow
CWA	Clean Water Act
DMR	Discharge Monitoring Report
DMT	Dissolved metal translator
IMZM	Inside mixing zone maximum
LTCP	Long-term Control Plan
MDL	Analytical method detection limit
MGD	Million gallons per day
NPDES	National Pollutant Discharge Elimination System
OAC	Ohio Administrative Code
Ohio EPA	Ohio Environmental Protection Agency
ORC	Ohio Revised Code
ORSANCO	Ohio River Valley Water Sanitation Commission
PEL	Preliminary effluent limit
PEQ	Projected effluent quality
PMP	Pollution Minimization Program
PPE	Plant performance evaluation
SSO	Sanitary sewer overflow
TMDL	Total Daily Maximum Load
TRE	Toxicity reduction evaluation
TU	Toxicity unit
U.S. EPA	United States Environmental Protection Agency
WET	Whole effluent toxicity
WLA	Wasteload allocation
WPCF	Water Pollution Control Facility
WQBEL	Water-quality-based effluent limit
WQS	Water Quality Standards
WWTP	Wastewater Treatment Plant