Ohio Environmental Protection Agency

Division of Surface Water
Response to Comments

Permit Name: Water Treatment Plant General Permit
Permit #: OHW000004

Agency Contact for this Project

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Ohio EPA held a public comment period from February 8, 2017, to March 11, 2017 regarding the draft Water Treatment Plant General Permit. This document summarizes the comments and questions received during the associated comment period.

Ohio EPA reviewed and considered all comments received. The comments and responses are grouped by dates and are summarized below.

Comment 1: **Request to Decrease Monitoring Frequency**
For discharges from lime soda softening facilities the permit proposes an increased sampling frequency for total residual chlorine, from once to twice a month, and total filterable residue (total dissolved solids) be analyzed weekly. These proposed changes are based on modeled estimates that some facilities may be likely to exceed limits for these parameters.

We propose after three months of sampling at this increased frequency, facilities which do not show levels of concern in their discharge be allowed to return to monthly sampling for chlorine and discontinue TDS sampling…

Response 1: The proposed weekly monitoring requirement at Outfall 005 was a reflection of the schedule in Outfall 004. However, sampling results at Outfall 004 demonstrate a low risk of exceeding the water quality standards. Ohio EPA proposes to reduce the TDS sampling frequency at Outfall 004 and 005 from weekly to monthly.

Biweekly chlorine sampling at lime soda softening facilities are only proposed at Outfall 005. Because this is a general permit, the workload and logistics of evaluating the three months of data and implementing a different monitoring schedule for each individual permittee under the general

permit is not feasible for our staff. If a permittee would prefer a monitoring schedule be applied specifically for the quality of its own discharge, the permittee may consider applying for coverage under an individual NPDES permit in lieu of coverage under this general permit.

Comment 2: **Total Organic Carbon**
The permit proposes monitoring discharges for total organic carbon (TOC), total residual chlorine and microcystin within 24 hours of raw water exceeding Ohio's Elevated Recreational Health Advisory at the raw water sampling point. [The Greater Cincinnati Water Works (GCWW)] does not object to monitoring chlorine and microcystin. However, we believe monitoring TOC will not achieve the goal of determining the amount of [powdered activated carbon (PAC)] discharged to the river. TOC analyses will not differentiate between naturally occurring TOC, and carbon introduced from the PAC…

Response 2: Monitoring and reporting for TOC has been removed from Part III of the general permit. Where TOC was originally included in the permit as a precaution against discoloration in the wastewater, the footnotes below every effluent table already prohibits "discolored and odorous discharges". Due to the redundancy, Ohio EPA does not expect the removal of TOC monitoring requirements to impact the permit's effectiveness in protecting and maintaining water quality.

Regarding the effluent monitoring frequency of microcystin and total residual chlorine, refer to Response 3.

Comment 3: **Clarification on the Monitoring Frequency**
Regarding TOC, chlorine, and microcystin referenced in the previous comment, the permit states these should be analyzed while discharging. The permit is not clear as to the frequency of sampling required. We suggest that sampling frequency for these parameters be specified as once every two weeks during the period specified.

Response 3: Ohio EPA has changed sampling schedule for microcystin and the updated requirements are specified in "Footnote a" of each outfall in Part III of the general permit. The draft permit now requires weekly sampling of microcystin, pH, total suspended solids (TSS), and chlorine at the effluent on

a weekly basis whenever the raw sampling station exceeds the microcystin threshold. Once the raw sampling station is below the microcystin threshold, monitoring for microcystin is not required and monitoring of the other parameters shall continue the regular monitoring schedule indicated in Part III of the permit. This change is meant to provide a clearer and straight-forward monitoring schedule.

The sampling frequency for microcystin shall remain as "When Discharging" frequency because this option will not automatically prompt for results when submitting the electronic Discharge Monitoring Report (eDMR). A weekly sampling frequency, however, will automatically require data entry and will make the data entry process more time-consuming.

In addition, monitoring of TOC is no longer required (refer to Response 2).

Comment 4: **Treatment and Best Management Practices**
[Part IV, Item K] of the proposed permit requires treatment be provided for all temporary discharges related to HAB control and requires any backwashes associated with increased PAC addition have a solids settling process prior to discharging. While we understand the intention of this requirement to protect surface waters, this presents and undue burden to utilities for events which may be extremely infrequent. For example, GCWW has experienced only one algal event where we have needed to discharge backwash water with PAC. Due to the configuration of our waste water system, a system capable of re-pumping and treating a minimum of 10 million gallons per day would likely need to be installed to address a situation which we hope will be rare, and short term. We suggest these requirements not be imposed on utilities unless algal blooms become a regular and frequent occurrence in their water source.

Response 4: These conditions are meant to prevent bypass events and allows the discharge into an NPDES-permitted sanitary sewer, lagoon, or wastewater treatment system in lieu of treating or bypassing the wastewater. However, Ohio EPA acknowledges that, under extenuating circumstances, a facility may not have the means to discharge to another

NPDES-permitted facility or provide the treatment specified in Part IV, Item K of the general permit.

In response to this comment, Part IV, Item L of the draft permit now allows the permittees the option of submitting a No Feasible Alternative Analysis Study for bypasses of HAB-related discharges. For the duration of coverage under this permit and subsequent to the Director of Ohio EPA approving a facility's study, bypasses of HAB-related discharges may be approved by the Director if it meets the requirements in Part V, Item R. By including this option, the permit conditions should not impose infeasible requirements to the permittee.

Comment 5: **Business Impact Analysis**
No Business Impact Analysis was done for the proposed changes in the permit, particularly changes related to harmful algal bloom response. Because these changes have the potential to result in significant capital and operational costs for utilities, we recommend a business analysis be conducted.

Response 5: The requirement to conduct a Business Impact Analysis is applicable to the Ohio Administrative Code rulemaking process, not the issuance of general permits. In addition, the inclusion of an optional No Feasible Alternative Analysis Study (see Response 4, above) already addresses the concern that permit's treatment requirements during HAB events will incur high costs.

<u>Other Changes Made</u>
Ohio EPA revised the language in Part V, Item S "Noncompliance Notification" to require electronic reporting through the Ohio EPA eBusiness Center. This change is in compliance with US EPA's NPDES Electronic Reporting Rule which became effective on December 21, 2015.

End of Response to Comments

Sincerely,

Phoebe Low
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