



Division of Surface Water Response to Comments

Project: Small Sanitary Dischargers General Permits
Ohio EPA ID #: OHS000004 and OHV000003

Agency Contact for this Project

Division Contact: Gary Stuhlfauth, Division of Surface Water, (614) 644-2026,
gary.stuhlfauth@epa.ohio.gov

Ohio EPA held a public comment period beginning on January 27, 2015 on the renewal of two general permits: OHS000004 for small sanitary dischargers; and OHV000003 for small sanitary dischargers that cannot meet Best Available Demonstrated Control Technology (BADCT) standards. This document summarizes the comments and questions received during the comment period, which ended on March 1, 2015.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

Comments Received From U.S. EPA Region 5

U.S. EPA identified three issues that Ohio EPA needed to address to ensure the permits conform with Federal and State requirements.

Comment 1: pH – The two permits must contain pH monitoring and limits to comply with technology standards. Permit OHV000003 would require pH monitoring in table 001 and pH design limits in table 101. Permit OHS000004 would require pH limits and monitoring in tables 001 through 006 and table 011.

Response: In permit OHV000003, monitoring for pH was added to table 001, and pH limits were added to the design limits in table 101.

In permit OHS000004, pH monitoring and limits were added to tables 001 through 006 and to table 011.

Comment 2: NOI – In Part II.B of permit OHS000004, ‘supplemental information’ is required with the NOI form. ‘Supplemental information’ is not specifically required in permit OHV000003. This should be explained or the same requirement should be added to OHV000003. In addition, the recommended changes to the NOI and supplemental information language will help give clear direction to permittees on the information that must be submitted.

Response: After discussing with U.S. EPA, the Agency decided that the same supplemental information should be required for both permits, and permit OHV000003 was revised accordingly. U.S. EPA recommend revisions to the language in the draft permit that the Agency believes clarified the NOI/supplemental information requirements. The permit language was edited to include these recommendations.

While U.S. EPA suggested that a line drawing of a facility’s treatment system be included with the supplemental information, Ohio EPA believed a narrative listing the types of treatment would suffice for the facilities covered under these permits. The permit language was revised to be more descriptive of the treatment narrative.

Comment 3: Sludge – Both OHV000003 and OHS000004 require permittees to report the volume of sludge taken to another NPDES permit holder. In addition, the permit must either: (1) include a statement that sludge may only be transported to and used by another NPDES permit holder, or (2) add requirements to report the volume of sludge used or disposed by other methods (e.g., landfilling or land application).

Response: Item D in Part IV of the permits, which is a special condition related to the sludge reporting in Table 588, was revised to address situations when a permittee would use either landfilling, land application or public distribution as an alternative to hauling sludge to another NPDES permit holder. The permittee must notify Ohio EPA before this occurs and additional requirements may apply. The volume or weight of sludge disposed by an alternate method would be reported to the Agency as part of an annual notification.

Other revisions to the draft permits: U.S. EPA and Ohio EPA staff suggested revisions to language in the draft permits that, while not substantive, would make them easier to understand and clarify responsibilities.

End of Response to Comments