



Division of Surface Water Response to Comments

Project: General Permit-To-Install Gravity Sewer Extensions
Ohio EPA Permit #: 3745-42-SS002

Agency Contacts for this Project

Division Contact: Ashley Ward, (614) 644-4852, ashley.ward@epa.ohio.gov
Public Involvement Coordinator: Mary McCarron, (614) 644-2160,
mary.mccarron@epa.ohio.gov

Ohio EPA held a public comment period on May 30, 2013 regarding the general permit-to-install gravity sewer extensions. This document summarizes the comments and questions received during the associated comment period, which ended on July 15, 2013.

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.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Comment 1: **Self Certified plans for water line extensions are submitted for approval on a reduced fee basis. Will Ohio EPA consider a reduced fee for sanitary sewer General Permits? (Medina County Sanitary Engineering Department)**

Response 1: Not at this time. For Self Certified plans, Section 3745.11 of the Ohio Revised Code (ORC) provides that “a person who has entered into an agreement with the director under division (A)(2) of section 6109.07 of the Revised Code shall pay an administrative service fee for each plan submitted under that section for approval that shall not exceed the minimum amount necessary to pay administrative costs directly attributable to processing plan approvals. The

director annually shall calculate the fee and shall notify all persons that have entered into agreements under that division or who have applied for agreements, of the amount of the fee.”

In order for Ohio EPA to reduce the fee for sanitary sewer General Permits, there would have to be a legislative change to ORC Section 3745.11.

Comment 2: **Is there a definition for “stream” that can be used by the design engineer for determining whether the sewer is crossing a drainage channel or an actual stream which would require the Stream Evaluation Addendum? (Medina County Sanitary Engineering Department)**

Response 2: Yes, “waters of the state” as defined in ORC Section 6111.01: ““Waters of the state” means all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, irrigation systems, drainage systems, and other bodies or accumulations of water, surface and underground, natural or artificial, regardless of the depth of the strata in which underground water is located, that are situated wholly or partly within, or border upon, this state, or are within its jurisdiction, except those private waters that do not combine or effect a junction with natural surface or underground waters.”

Comment 3: **Although not directly related to Drinking Water issues, we found it interesting that under Part 1, Section B, Item 2, the Division of Surface Water (DSW) doesn’t limit the use of general permits to sewer extensions installed in accordance with the design standards listed in Part III of the general permit (taken from or modified from Ten States Standards). If these are minimum standards to be met, it would seem logical that anything not meeting these criteria should not be covered under the general permit. (Ohio EPA, Division of Drinking and Ground Waters)**

Response 3: It is the intent of this permit that the use of the general permit is limited to sewer extensions installed in accordance with the design standards listed in Part III. This has been made clear by adding Part 1.B.2.I as follows:

“I. Coverage under this permit is limited to sewer extensions installed in accordance with the design standards listed in Part III of this permit.”

Comment 4: Part III, Section H, Item 1 states “Sewer lines shall be laid at least 10 feet horizontally from any existing or proposed water main. This distance shall be calculated from the edge of the water pipe to the edge of the sewer pipe. Deviation from this distance may be allowed provided that the water main is laid in a separate trench from the sewer line and the top of the sewer line is 18” below the bottom of the water main.”

The last sentence should be deleted. If the 10’ horizontal distance from water mains can’t be met, an individual Permit-to-Install (PTI) should be required so the project can be looked at more closely. It’s not just that the water and sewer lines need to be 18” vertically in separate trenches, we also need to look at why the 10’ horizontal distance isn’t being met and ensure that if it truly can’t be met that the horizontal spacing is maximized as much as possible. This will not be done in a general permit situation. The individual PTI process is set up to notify other divisions when a PTI is submitted. This would give Drinking Water an opportunity to review the project which I don’t think is available under general permits. (Ohio EPA, Division of Drinking and Ground Waters)

Response 4: This change has been made and is now consistent with the Recommended Standards for Wastewater Facilities, Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 2004 edition and the Recommended Standards for Water Works, 2012 edition.

Comment 5: Part III, Section H, Item 3 states “Sewers shall not be laid within 200 feet of public water supply wells, or other public water supply sources and structures and within 50 feet of private wells or private water supplies.” If DSW wants to include a specific value, the language must be changed to 300 feet to ensure proper isolation for the larger wells. The other option is to refer to the isolation radius of the wells. This would allow placement of the sewer closer for smaller non-community wells but ensure the 300’ isolation radius for larger wells. If DSW uses the isolation radius language, it may then need to be defined in Part VI Definitions. (Ohio EPA, Division of Drinking and Ground Waters)

Response 5: Part III, Section H, Item 3 has been changed to the following: Unless local conditions dictate greater distances, sewers shall not be laid within the distance of water supply wells as detailed by the following isolation radii and well sitting criteria:

Estimated Daily Water Usage (Q)	Minimum isolation distance
0 - 2,500 gpd	50 feet
2,501 - 10,000 gpd	(Square Root of Q) feet
10,000 - 50,000 gpd	(50 + Q/200) feet
greater than 50,000 gpd	300 feet

Comment 6: Part IV, Section J states “All gravity sanitary sewers which are located in well field areas shall comply with and be tested as specified in Ohio Environmental Protection Agency Guideline Gravity Sewers in Well Field Areas, February 1983.” This is not an official current guideline, as such, this reference to an old guidance should be deleted. We want to keep sewers out of well fields especially on new installations so we don’t want to include this in a general permit. Again, if for some reason an exemption to the rule to keep sewer lines out of the isolation radius of a well is granted, it should be done under an individual PTI so special conditions can be included not under a general permit. (Ohio EPA, Division of Drinking and Ground Waters)

Response 6: Part IV, Section J has been removed because Part III, Section H has been changed (see Response 5) to prohibit gravity sewers from being located in well fields.

Comment 7: We suggest expanding coverage of the general permit to include 15” to 18” sanitary sewers, from the maximum of 12” for the following reasons:

- Larger Utilities may have many sanitary sewers between the sizes of 15” to 18” that would comply with the same requirements for the 8” – 12”.
- By expanding the size range, this would allow more applications to qualify for the General Permit, thereby reducing the hours required by the Ohio EPA staff for reviews. This would also provide an opportunity to decrease the number of

**permits that require a lengthy review process.
(Ohio Water Environment Association)**

Response 7: This change has not been made. The purpose of the general permit is to grant coverage to similar small-scale projects. There are more concerns associated with the larger diameter sanitary sewers. In addition, the average process time for sanitary sewer extension PTIs is relatively short.

Comment 8: **Part III. Description of General Permit Coverage provides one statement on what is covered under the permit and numerous exclusions, which are potentially difficult to accurately interpret. We suggest adding a section which provides clearer statements on circumstances when the general permitting procedure should be considered and the requirements can be met. Some suggested language:**

- Sewer extensions connecting a new housing development
- Sewer extensions in rural sewershed areas
- Sewer extensions for a proposed industrial/commercial developments, and
- Others.

An example project meeting these requirements would be a sewer extension, located in a sewershed with no known Sanitary Sewer Overflows (SSO) or basement flooding. (Ohio Water Environment Association)

Response 8: This change has not been made. There are too many circumstances for the general permitting procedure to list them all. Ohio EPA believes it is more efficient and easy to understand to list only the exclusions.

Comment 9: **There are a number of exclusions precluding circumstances where the general permitting procedure will not apply. Some of these exclusions will/may require interpretation as there may not be a simple or straightforward answer. An example would be an applicant with an older downtown area served by combined sewers. The applicant may not be able to easily demonstrate to Ohio EPA that additional flows created by the sewer extension may not increase the magnitude or frequency of overflow events, either as Combined Sewer Overflows or SSOs.**

Please explain who performs the initial screening to determine what PTI applications meet the eligibility criteria? The initial screening seems to be the most difficult step. (Ohio Water Environment Association)

Response 9: The applicant performs the initial screening to determine what PTI applications meet the eligibility criteria and then Ohio EPA verifies the information before coverage is granted.

Ohio EPA is always available to answer questions about coverage eligibility.

In the example given in the comment, the applicant would not be eligible.

Comment 10: **We also suggest clearly identifying the situations where completion of attachments is required, and example calculations to facilitate greater understanding and accuracy of when conditions surrounding the general permits may apply. (Ohio Water Environment Association)**

Response 10: No changes have been made, but Ohio EPA is always available to answer questions.

Comment 11: **Utilities vary in signatory authority responsibility when certifying binding information. We suggest revising the second bullet to in Part IV. Required Notice of Intent Information:**

“One copy of a completed and accurate Notice of Intent (NOI) signed by the Applicant, *A Certification Statement from an authorized representative from the Utility(s) receiving the proposed wastewater flow into their collection and/or treatment facility* and a Certification Statement from the design engineer.”

The blue italic text denotes the suggested change. (Ohio Water Environment Association)

Response 11: This change has been made.

End of Response to Comments