



March 11, 2024

Anne Vogel  
Director  
Ohio Environmental Protection Agency  
50 West Town Street  
Columbus, Ohio 43215

Director Vogel,

I am writing on behalf of the Licking County Health Department (LCHD) regarding the Ohio EPA's draft General Permit to Discharge Wastewater from Sewage Treatment Systems Designed to Facilitate Rapid Growth in Central Ohio on an Interim Basis.

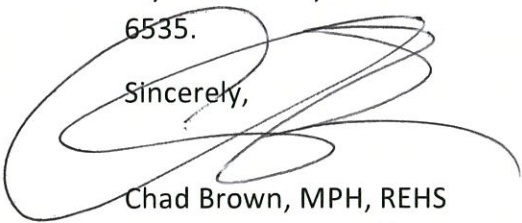
The draft permit allows for new point source discharging sewage treatment systems (STS) designed to treat an average daily flow of up to 75,000 gpd in Licking and Delaware Counties. Allowing new discharging systems increases the likelihood of untreated wastewater being discharged to waterways across Licking County. This will result in the degradation of our environment and pose a public health risk to drinking water for county residents.

LCHD prohibited the installation of off lot discharging STSs in the early 2000s due to a high failure rate that resulted in public health nuisance conditions. These systems require maintenance and monitoring to ensure they work properly. While we understand a licensed operator will be required for each new STS, these systems pose a higher risk of failure than on lot systems or municipal wastewater systems.

Our department supports growth and development in our county, and we have worked to improve our processes so that we are not inhibiting development. However, willingly adding discharging STSs serving large developments poses an unnecessary risk to the public health of the citizens of Licking and Delaware Counties. As a result, LCHD is against the adoption of this draft permit.

If you need any additional information from our department, please contact me at 740-349-6535.

Sincerely,



Chad Brown, MPH, REHS  
Licking County Health Commissioner

Cc: Licking County Board of Health  
Licking County Board of Commissioners  
Licking County District Advisory Committee