



LICKING COUNTY BOARD OF COMMISSIONERS

DUANE H. FLOWERS • RICK BLACK • TIMOTHY E. BUBB

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Ohio EPA
Division of Surface Water – Permits Processing Unit
P.O. Box 1049
Columbus, OH 43216-1049
[also sent to by email: epa.dswcomments@epa.ohio.gov]

Re: Central Ohio Rapid Growth Interim Master General Permit Proposal

To Whom It May Concern:

This letter is intended to convey the Licking County Board of County Commissioners' opposition to the proposed enactment of a rule which would grant permits for the construction/operation of small sanitary facilities (< 75,000 gpd). After considerable thought, the Board is of the opinion that the proposal does not sufficiently address several concerns.

For starters, the current proposal is woefully insufficient to address long-term maintenance of these facilities. It is simply unrealistic to expect developers or home owners' associations to be accountable for long-term maintenance of these facilities ... which, of course, means tax payers will ultimately have to foot the bill.

Moreover, the current proposal fails to grant sufficient local regulatory control or enforcement authority ... or, for that matter, the funding to make that possible ... to assure that these facilities would be routinely monitored, inspected and thus certain to be operating safely.

And, as if that were not enough to justify rejecting the plan, the proposal is inadequate to address the certainty that, at some point, these facilities will need to be decommissioned. Again, left unaddressed the tax payers will undoubtedly be expected to foot that bill too.

Finally, this proposal will almost certainly de-incentivize a public utility's motivation to focus on timely expansion of services to unserved, or underserved, areas. Why make that a focus if these facilities are scattered around the county?

For these reasons, this Board opposes the proposal in its current form and in any form that does not fully address all of these concerns.

Sincerely,

Duane H. Flowers

Rick Black

Timothy E. Bubb