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From: partee@littlemiami.com

Sent: Thursday, August 14, 2003 2:21 PM

To: Bruce Smith

Subject: Please enter the following LMI comments into the public comment record fro the subject permit application

# Little Miami

INCORPORATED

6040 Price Road Milford OH 45150

August 14, 2003

Ohio EPA, Division of Surface Water  
Permits Processing Unit  
P. O. Box 1049  
Columbus, Ohio 43216-1049

Subject: LMI comments on the Clermont County Loveland-Miamiville WWTP Proposed Wastewater Treatment Plant

Dear OEPA:

Little Miami, Inc. offers the following comments on this date:

Since 1967 Little Miami, Inc. has received millions of dollars of contributions from the citizens of Ohio to preserve and restore the Little Miami National and State Scenic River.

We ask that OEPA provide leadership in restoring the Little Miami to full ecological health and that all stretches of the Little Miami be restored to full attainment of Exceptional Warmwater Habitat (EWH) criteria.

It appears from the 1998 OEPA field data and report that the Little Miami in the Miamiville area is being impacted by point source discharges upstream of Miamiville and that EWH criteria are not being fully attained. We deduce from this that the assimilative capacity of the Little Miami is being exceeded in the Miamiville area. Thus, further, we deduce that the proposal to create a new point source discharge into a tributary of the Little Miami will further exacerbate this problem and exceed the total (100%) assimilative capacity of the Little Miami. We understand from Mr. Bruce Smith of OEPA that OEPA is prohibited by law to permit discharges which lead to more than 70% of the assimilative capacity being used. The proposed Loveland-Miamiville WWTP loading should not be permitted until such time as this 70% limit is not exceeded.

It is not clear from the information from the application and other information obtained by LMI in this matter that the County's claim that the sewerage of several historic neighborhoods will result in improvement in the health of the Little Miami. From our inquiries with Mr. Thomas C. Yeagar, it appears to LMI that the County does not have the data regarding the condition of the tributaries in the subject drainage area into which these package plants discharge. Without this and other data, it is not certain that by taking these package plants off line, that the health of the Little Miami Scenic River will be noticeably improved and that the per cent of assimilative capacity in the Little Miami utilized would be reduced to a legal limit. Only when this limit is reached should discussions be entertained for additional point source discharge.

8/14/2003

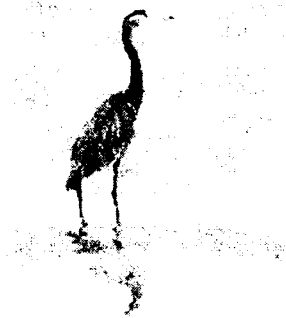
Given that, not one, but three (Sycamore Creek WWTP, a new Loveland-Miamiville WWTP, and a greatly expanded Mason WWTP) proposed WWTP expansions/addition are under discussion to discharge into the Lower Little Miami basin, and with an estimated 40% of the Little Miami's low flow being comprised of point source discharge in the Miamiville area, a TMDL Study should be done now, before significant taxpayer dollars are expended on public projects which will drive the health of the Little Miami lower and/or not lead to the timely restoration of full ecological health of the Little Miami National & State Scenic River.

LMI's 600+ family members request that OEPA give serious consideration to LMI's comments.

Sincerely,

Eric B. Partee  
Executive Director

# Little Miami INCORPORATED



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*Celebrating 36 years of River Conservation along the Little  
Miami National & State Scenic River  
Since 1967*

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