



July 18, 2022

Citizen Petition Comment

Facility: Plain City WWTP
Permit #: 4PB00016*JD

The Proposed Permit for Plain City Wastewater Discharge Increase Should Be Denied Pending Adequate Planning and Pollutant Limitation and Monitoring

The Big Darby Creek is one of the most important streams in Ohio and the entire Midwestern United States. Located just west of Columbus, Ohio, the Darby is a National and State Scenic River because of its outstanding aquatic biodiversity. The Darby has some of the highest biodiversity of fish and mussels in the Midwest, including state and federally endangered species. In 1991, The Nature Conservancy declared it one of the dozen “Last Great Places” in the western hemisphere.

But the Big Darby is in serious trouble. Urban and suburban development in the watershed has increased since 1991 and threatens to increase substantially in the coming years. The freshwater mussels in the Darby, especially the federally listed species, are in decline. A serious mussel die-off occurred in Big Darby Creek in 2016, and mussel population trends are concerning.

Growth estimates for the 15-county Central Ohio region suggest we will reach 3 million residents (and possibly significantly more) by 2050, compared to 2.2 million residents in 2010. This translates to the addition of approximately 1.2 million new households during that timeframe. Without serious and consistent leadership from decision-makers in Central Ohio, we run the risk of extensive development happening in an ad hoc and environmentally destructive manner rather than with forethought or adequate guardrails to conserve and protect our natural resources.

We must increase water quality and water quality protections for the Darby, or we will lose the rare biodiversity that makes this stream so special. Smart planning, sustainable development, and the extensive preservation and restoration of natural open space in the watershed are mandatory if the Darby’s rich biodiversity is going to survive.

The Ohio EPA is proposing to approve a local sewer and wastewater discharge permit that will allow for the doubling of Plain City’s effluent to the Darby, from .75 million gallons per day (MGD) to 1.5 MGD. Plain City is located in Madison and Union Counties, just west of Franklin County and immediately adjacent to the mainstem of the Big Darby Creek. The proposed Plain City wastewater permit raises serious concerns about potential impacts to the Darby, including a potential dramatic increase in nitrate pollution and increases in pharmaceutical pollutants, both of which harm mussels. Additionally, a doubling of Plain City’s wastewater treatment capacity will facilitate substantial housing and commercial development in the

area immediately beside the Darby. In turn, these projects threaten to generate significant stormwater runoff pollution that could dramatically harm the Darby's sensitive biodiversity by elevating the stream's pH (which would increase the toxicity of other pollutants) and by altering stream flow patterns.

One of the most troubling aspects of this proposed permit is that it has not been subject to a broader and adequate planning process to first determine the scale of potential impacts from the development it will surely facilitate. Several years ago, Franklin County, the City of Columbus, and several adjacent municipalities engaged with Ohio EPA and the public in a comprehensive planning process for future development in the Darby watershed. A similar – and modernized – planning process needs to happen in the other counties and communities in the Darby watershed before substantial wastewater approvals and substantial new development move forward. The proposed Plain City permit represents an ad hoc, piecemeal approach that fails to comprehensively evaluate and account for the harms it will cause to the watershed. Without comprehensive planning and analysis for sustainable development and preservation, the biological diversity of Big Darby Creek will surely be lost. Forever.

In light of the foregoing, the Ohio Environmental Council recommends the following:

1. Ohio EPA should deny the proposed draft Plain City wastewater discharge permit pending the completion of a comprehensive planning process that adequately quantifies and evaluates the reasonably foreseeable stormwater impacts resulting from increased development. The planning process must identify and require implementation of sustainable development and stormwater control methods and technologies that eliminate pollutant increases to the Darby. Development in the watershed should, at a minimum, follow the plan of the Big Darby Creek Accord as well any other state-of-the-art low impact development practices that have been established since the Accord; these policies and practices should be implemented prior to any expansion of the WWTP. If stormwater control practices prove insufficient to protect Big Darby Creek, there is no practical or satisfactory way to remove or fix inadequate, shortsighted development practices after damage has occurred.
2. In addition to conditioning the issuance of any permit for the expansion of wastewater discharge into the Darby on the above, Ohio EPA should condition any wastewater discharge increase for Plain City on robust analysis, monitoring, and limitation of pollutants harmful to the Darby's aquatic biological assemblages, including but not limited to: a limitation and monitoring for Nitrates (not currently in the proposed draft permit); a stronger limitation and stronger monitoring of Ammonia (which as proposed requires only quarterly monitoring and a pollutant limit currently less stringent than the recommended federal standard); a limit and monitoring for contaminants of emerging concern (CECs) such as biologically active pharmaceuticals and personal care products; and, generally, more robust monitoring requirements that include sampling for pollution intolerant mussel and fish species, that account for periods of low-flow, and that occur more frequently than quarterly.