

10.0 Wastewater Collection and Treatment Systems Planning

Wastewater Treatment Facility Plans and their associated Facility Planning Areas are the cornerstones of the AWQMP. In response to Ohio EPA directives, the Planning Commission updates the wastewater treatment-related portions of the AWQMP to ensure that current and future wastewater treatment needs are met in ways that are protective of the region's water resources. The update process is undertaken with the following objectives:

1. Provide a regional inventory of the agencies responsible for wastewater treatment, planning areas, and surface water quality protection facilities and infrastructure;
2. Define regional policies to guide future wastewater infrastructure planning and development; and
3. Identify, evaluate, prioritize and recommend future water quality improvement projects intended to help surface water bodies attain Ohio EPA intended use designations.

This section provides a summary of the policies adopted by the Planning Commission to review and approve updates to Wastewater Treatment Facility Plan and modifications to Facility Planning Areas, as well as the requirements for completing and submitting planning documents.

10.1 WASTEWATER FACILITY PLANNING

On September 1, 2005, MVRPC Board of Directors adopted the following Areawide Wastewater Facility Planning Policies (see **Appendix N**):

Policy A: Designated Management Agencies

Policy B: Facility Planning Area Boundaries

Policy C: Modifications to Facility Planning Area Boundaries

Policy D: Development of Local Wastewater Management Options

Policy E: AWQMP Consistency Reviews

Policy F: Utilization of Areawide Population Projections

Policy G: Modifications to Designated Management Agencies

Policy H: Nomination of New Designated Management Agencies

The MVRPC document entitled: *Guidelines for Facility Plan (FP) and Facility Planning Area (FPA) Update Proposals: Content, Submittal & Review* is presented in **Appendix O**. This guidance document provides detailed instructions on what information is required for a FP and in what format the GIS mapping of FPAs must be provided.

10.1.1 Designated Management Agencies

As defined in Policy A, owners and operators of publicly owned WWTPs (WWTPs, aka Publicly Owned Treatment Works or POTWs) are identified as *Designated Management Agencies*

(DMAs). Primary DMAs are the entities responsible for the planning, financing, construction, operation and maintenance of WWTPs and collection systems. Satellite DMAs are the entities responsible for sanitary sewers, lift stations, and sometimes treatment facilities tributary to a primary DMA's collection and/or treatment systems. Satellite DMAs provide services that complement Primary DMA operations, usually pursuant to an agreement or contract between the entities.

Each primary DMA is responsible for developing and maintaining a *Wastewater Treatment Facility Plan* (FP, aka 201 Plan) that identifies and prescribes wastewater management approaches in a surrounding *Facility Planning Area* (FPA). These management approaches represent the current and best understanding about where sewers will be extended and where areas will remain un-sewered over the twenty year planning period. The designation of DMAs reduces the potential for duplication of services and investment in infrastructure by preventing multiple (and potentially competing) treatment facilities from being planned or constructed in an FPA.

As prescribed by the Ohio EPA in the 2006 State WMP, County Commissioners (or a sewer district under ORC 6119) are responsible for sewage collection and treatment in unincorporated communities. Where sewers are not available, approval of individual home sewage treatment systems is the responsibility of the County Health Department or local health department.

There are currently sixty-four (64) recognized DMAs within the Miami Valley Region. Primary DMAs and their associated FPAs are listed by county in **Table 10-1**.

Table 10-1. Miami Valley Region Designated Management Agencies

County	DMA	FPA(s)
Darke	Village of Ansonia	Ansonia/Roszburg
	Village of Arcanum	Arcanum
	Village of Burkettsville	Burkettsville/New Weston ¹
	Darke County	Darke County Unincorporated
	Darke County General Health District	
	Darke County SWCD	
	Village of Gettysburg	Gettysburg (satellite to Bradford)
	City of Greenville	Greenville
	Village of New Madison	New Madison
	Village of North Star	Osgood/Yorkshire/North Star
	Village of Osgood	Osgood/Yorkshire/North Star
	Palestine-Hollansburg Joint Sewer District	Palestine-Hollansburg
	Village of Pittsburg	Pittsburg
	Village of Union City	Union City
	Village of Versailles	Versailles

¹ The FPA encompassing the Burkettsville/New Weston area of Darke County which drains to a WWTP located in St. Henry in Mercer County.

	Village of Wayne Lakes	Wayne Lakes (satellite to New Madison)
	Village of Yorkshire	Osgood/Yorkshire/North Star
Preble	Village of Camden	Camden
	Village of College Corner	College Corner ²
	City of Eaton	Eaton
	Village of Eldorado	Eldorado
	Village of Gratis	Gratis
	Lakengren Water Authority	Lakengren
	Village of Lewisburg	Lewisburg
	Village of New Paris	New Paris
	Preble County	Preble County Unincorporated
	Preble County Public Health	
	Preble County SWCD	
	Village of Verona	Verona
	Village of West Alexandria	West Alexandria
	Village of West Elkton	West Elkton
	Village of West Manchester	West Manchester
Miami	Village of Bradford	Bradford
	Village of Covington	Covington
	Village of Laura	Laura/Potsdam
	Miami County	Bethel Township, Fletcher, Southwest Bethel Township Service Area, Miami County Unincorporated, Tri-Cities
	Miami County Public Health	Miami County Unincorporated
	Miami County SWCD	
	City of Piqua	Piqua
	Village of Pleasant Hill	Pleasant Hill
	Tri-Cities North Regional Wastewater Authority ³	Tri-Cities
	City of Troy	Troy
	Village of West Milton	West Milton
Montgomery	City of Brookville	Brookville
	Franklin Regional Wastewater Treatment Corporation ⁴	Germantown FPA (serving the Municipality of Germantown and Village of Carlisle ⁵)

² The College Corners FPA drains to a WWTP located in the state of Indiana.

³ In Miami County the Tri-Cities North Regional Wastewater Authority serves the cities of Tipp City and a portion of Huber Heights.

⁴ Franklin FPA is located within the Areawide planning area of the OKI Council of Governments. The Franklin Regional Wastewater Treatment Corporation is DMA of the Franklin FPA, per the OKI 208 Plan. Village of Carlisle is a wastewater collection DMA, per the OKI 208 Plan.

⁵ The Municipality of Germantown and Village of Carlisle are responsible for wastewater collection. Wastewater treatment is managed by the Franklin Regional Wastewater Treatment Corporation.

	City of Dayton	Dayton
	Public Health Dayton and Montgomery County	Montgomery County Unincorporated
	City of Englewood	Englewood
	Village of Farmersville	Farmersville
	Tri-Cities North Regional Wastewater Authority ⁶	Tri-Cities
	City of Miamisburg	Miamisburg
	Montgomery County	Eastern Regional, Western Regional, Opossum Creek, Montgomery County Unincorporated
	Montgomery County SWCD	Montgomery County Unincorporated
	Village of New Lebanon	New Lebanon
	City of Union ⁷	Union
	City of West Carrollton	West Carrollton
Greene	Village of Bowersville	Bowersville
	City of Fairborn	Fairborn
	Greene County	Sugarcreek ⁸ , Beavercreek, Cedarville, Clifton, Greene County Unincorporated
	Greene County Public Health	Greene County Unincorporated
	Greene County SWCD	Greene County Unincorporated
	Village of Jamestown	Greene County Unincorporated Jamestown
	City of Xenia	Xenia
	Village of Yellow Springs	Yellow Springs
	Clark County	Clark County Southwest Regional

Some county commissions in the MVRPC planning area have established sanitary sewer districts under powers granted by Ohio Revised Code section 6117. In addition one or more political subdivisions of the state may establish water and/or sewer districts under ORC section 6119. Many of these districts exist in the region but do not have facility planning areas under the Water Quality management Plan. Table 1-2 lists these districts as additional locations served by public sanitary sewer.

⁶ In Montgomery County, the Tri-Cities North Regional Wastewater Authority serves the cities of Vandalia and a portion of Huber Heights.

⁷ Union is a city in Montgomery and Miami Counties

⁸ Sugarcreek FPA extends into Montgomery and Warren Counties.

Table 10-2. Miami Valley Region ORC 6117 and ORC 6119 Sewer Districts

County	Sewer District (Type)	Location(s) Served
Darke	Rolin Acres (6117)	Rolin Acres Subdivision
Preble	County Sewer District #2 (6117)	Pinewood Drive and Cedarwood Drive (Twin Township)
	County Sewer District #3 (6117)	West Elkton
	Lakengren Water Authority (6119)	Lakengren community
Miami	County Sewer District (6117). District encompasses the entire County.	Multiple discreet service areas including Brandt, Casstown, Concord Township North, Concord Township South, Monroe Township, Phonton, Springcreek Township, Studebaker Historic Site, Village of Fletcher
	Monroe Township Water and Sewer District (6119)	Monroe Township
Montgomery	Greater Moraine-Beaver Creek Sewer District (6117). District encompasses the entire county.	District includes areas within FPAs managed by Montgomery County (Eastern Regional, Western Regional, Possum Creek) as well as the Montgomery County portion of the Sugarcreek FPA. Other areas served flow to the Dayton WWTF.
	Franklin Regional (6119)	Germantown, Carlisle, Franklin, Warren County, Springboro
Greene	Greater Greene-Little Miami Sewer District (6117). District encompasses the entire county.	District includes areas within FPAs managed by Greene County (Beavercreek, Sugarcreek, Cedarville, Clifton) As well as the Greene County portions of the Eastern Regional, Jamestown, Clark County SW Regional, and Dayton FPAs
Shelby	Shelby County Sewer District	Arrowhead Hills subdivision Fair Haven Shelby County Home Hickory Dell Estates subdivision Lake Loramie Area Sewer District McCartyville Millcreek subdivision Village of Kettlersville

Policy G, Modifications to DMAs, outlines the process to be followed and policies applicable to when the need arises to consider changes to DMA designations within an FPA or affected jurisdictions seek to challenge DMA decisions and/or designations.

All entities that are not designated as a DMA must apply to be considered for that status prior to applying for permits. Policy H: Nominations of New DMAs, provides the factors considered by MVRPC's AFPSC when reviewing new DMA applications as well and the process undertaken to complete the review.

10.2 FACILITY PLANNING PROCESS

The development of Wastewater Facility Plans and Plan Updates involves the identification of viable local wastewater management options or prescriptions for a specified facilities planning area. The State WQM Plan includes recommended wastewater facility planning guidelines for individual POTWs as shown in Table 10-3.

Each wastewater utility in the Miami Valley Region is encouraged to complete wastewater facility planning in accordance with these guidelines as part of the overall MVRPC 208 planning process. Due to the schedule for completing the regional 208 Plan in 2011, individual utilities may not have completed each step in the recommended guidelines to develop the Facility Planning Area boundaries identified in this Plan.

Table 10-3. State WQM Plan Facility Planning Guidelines

Steps	Materials Submitted in Facility Plan
Delineate current service area	Provide up to date maps of the current sewer service areas with all trunk lines and pump stations shown.
Evaluate sewer system conditions	Identify needed improvements; provide cost estimates.
Evaluate need for additional sewer service area	Define a study area (FPA); delineate the geographic area that was evaluated relative to growth/development and the need for central sewers (provide on map).
Delineate projected service area	Forecast and map new areas expected to be sewered in the next 20 years (projected service area); provide cost estimates.
Develop prescriptions for wastewater treatment in areas without sewers	Evaluate options and select interim prescriptions for areas expected to be sewered within 20 years. Evaluate options and select permanent prescriptions for areas not expected to have sewers.
Evaluate wastewater treatment capacity	Itemize improvements, if any, to meet current needs (population now served) and provide cost estimates.
Determine future capacity need for treatment	Forecasts of population growth and other demands used to assess the treatment capacity needed in next 20 years.
Evaluate future wastewater treatment capacity options	Identify feasible alternatives, select most likely option(s); itemize improvements to meet future needs and provide cost estimates.
Develop general plan to implement improvements	Provide a capital improvement plan to finance necessary sewer and treatment upgrades; include a schedule for improvements (sewers and treatment plant); provide an operation and maintenance plan.
Qualify as Management Agency	Agree to provide services indicated in 201/208 plan; obtain written agreements with other governmental jurisdictions if service involves more than one jurisdiction.

10.2.1 Facility Planning Areas/Service Areas

As stated in its Water Quality Management Plan Framework, Ohio EPA defines a *Facility Planning Area (FPA)* as “A discrete geographical planning area of sufficient scope to allow for an analysis of various alternatives for the treatment and disposal of wastewater. An FPA established as part of the Section 201 construction grants program was a “study area” for determining the needs and cost effective methods of providing sewer service, and was not intended to equate to a service area. FPAs will continue to be viewed as study areas unless the applicable areawide planning agency establishes alternative definitions as part of the area’s 208 plan update.”

The Framework defines a *Service Area* as “A discrete geographic area within which a specific governmental jurisdiction or other entity has the authority and major infrastructure needs in place (e.g., trunk sewer lines, lift stations, interceptors, treatment capacity) to provide for the collection and treatment of sewage. The collection and/or treatment of sewage may be provided through legally executed contracts for such services, or other forms of intergovernmental agreements deemed acceptable to the parties involved.”

In the Guidance for Preparing a Facility Plan, U.S.EPA states “The facility planning area for new wastewater treatment systems should be large enough to analyze the cost-effective alternative methods of waste transport, treatment, handling and disposal of sludge and treated effluent. It also should be large enough to analyze the environmental effects of alternatives, as required by the regulations.”

Service Area boundaries should reflect the anticipated growth in a particular jurisdiction over the 20-year life of the Plan. The boundaries should support, and be supported by, local comprehensive plans or land use plans. Such anticipated growth should also be a realistic reflection of the future ability of the treatment plant to service all areas within the Service Area boundary. Service Area boundaries should not be so all encompassing as to place restrictive land use conditions on properties within the boundary, nor should they be so narrowly defined as to require frequent modification.

The introduction to the Areawide Wastewater Facility Planning Policies adopted by MVRPC on September 1, 2005, states the following:

“The overlap of multiple FPAs will not be permitted in Facility Plan and FPA updates. The Facility Planning process is intended to provide an organized and efficient approach to wastewater treatment planning. Allowing the overlap of FPAs brings undue confusion and conflict to the process, in addition to potentially resulting in duplication of effort, unwise public expenditures on redundant infrastructure, and excess plant capacities.

DMA’s may consider establishing a Primary-Satellite DMA relationship to resolve overlapping boundary issues.”

Neither the Facility Planning Policies nor Ohio EPA guidance forbids non-contiguous facility planning areas. Circumstances may arise in which a single facility serves multiple communities and the planning area may consist of separate, discrete areas.

Requests for plan updates that do not follow the policies are considered to be incomplete.

A list of the satellite/service agreements in place in the Miami Valley Region is provided in **Table 10-4**.

Table 10-4. Satellite/Service Agreements in the Miami Valley Region

Primary DMA (Treatment)	Satellite DMA/Agreement (Collection)
Village of Ansonia	Village of Rossburg
Village of Bradford	Village of Gettysburg
City of Dayton	Village of Phillipsburg, City of Vandalia, Montgomery County
Clark County Sanitary Engineer	City of Huber Heights, Miami County (Brant Area and Phonton, Bethel Township)
Village of New Madison	Village of Wayne Lakes (Wayne Lakes)
Village of St. Henry (Mercer County)	Burkettsville/New Weston FPA (Darke County)
Lakengren Water Authority	Preble County (Sanitary Landfill)
City of Piqua	Miami County Sanitary Engineering
City of Troy	
Tri-Cities North Regional Wastewater Authority	
Clark County	
City of Miamisburg	Montgomery County Environmental Services
Montgomery County Environmental Services	City of Miamisburg
Tri-Cities North Regional Wastewater Authority	City of Huber Heights, City of Tipp City, City of Vandalia
West Carrollton	Montgomery County Environmental Services (Western Regional)
Franklin Regional Wastewater Treatment Corporation	Germantown, Carlisle, Franklin, Warren County, and Springboro (part)
Village of Jamestown	Greene County (Shawnee Hills)
City of Xenia	Central State University
Greene County	Clark County (re: Clifton WWTP), City of Kettering (Eastern Regional WRF), and Montgomery County
City of Fairborn	City of Huber Heights

Policy B, Facility Planning Area Boundaries, includes a prohibition of overlapping FPAs and a provision for actions to be taken when boundary conflicts arise. Policy C, Modifications to Facility Planning Area Boundaries, outlines the process for changing FPA boundaries.

MVRPC maintains the map of all FPAs in the region's five-county area. These maps are used by the Ohio EPA in determining where Permits-to-Install (PTIs) for new sewer lines may and may not be issued.

In addition to a comprehensive update of plan contents, the 208 Plan Update process in 2011 included an opportunity for DMA agencies and jurisdictions to submit updates to Facility Planning Area maps for the consideration of the Facility Planning Subcommittee. The following FPA updates were submitted and included in the regional Facility Planning Areas map:

Ansonia	Eaton	Piqua
Bethel	Fairborn	Tri-Cities
Brookville	Huber Heights	Troy
Clark County	Miamisburg	Union
Southwest Regional	New Paris	Verona
		Xenia

In the years between May 5, 2011 and June of 2023 the Board of Directors of the Miami Valley Regional Planning Commission has adopted amendments to the AWQMP for updates to Facility Planning Area boundaries as follows:

- Greene County FPA – Included updates to the Beavercreek, Sugarcreek and Eastern Regional FPA. March 2, 2017.
- Dayton International Airport Area – Included changes to the Dayton, Union and Tri-Cities FPA. March 2, 2017.
- Palestine-Hollansburg Joint Sewer District – Creation of a new FPA for the villages of Palestine and Hollansburg in southwest Darke County. June 6, 2019.
- West Milton – Ludlow Falls Area – Included modifications to the West Milton and Laura/Potsdam FPA to shift the Village of Ludlow Falls from the latter to the former. June 6, 2019.
- Village of Wayne Lakes – Creation of a new FPA to serve the Village of Wayne Lakes, in southwest Darke County. December 2, 2021.
- Tri-Cities Minor Modification – Included shifting parcels from the Dayton FPA to the Tri-Cities FPA south of the Dayton International Airport. May 5, 2022.

Upon adoption of these updates to the 208 Plan by the MVRPC Board of Directors, these FPA boundaries were incorporated into the master FPA map maintained by MVRPC.

The current (February 2023) Facility Planning Areas in the Miami Valley Region are shown in **Appendix P**. Facilities Planning Areas presented by County are that are shown in **Figures 10-1** through **10-6** as described in **Table 1-5**.

Table 10-5. Facility Planning Area Maps by County

County	Figure
Darke	10-1
Preble	10-2
Miami	10-3
Montgomery	10-4
Greene	10-5
Shelby	10-6

Table 10-6 provides current FPA statistics within each County. FPAs are considered for this discussion to be the boundaries of those POTWs that have distinctive service area boundaries.

Table 10-6. Current Facility Planning Areas within the Miami Valley Region

County	Number of FPAs	Area within FPA (sq. mi.)	Total Area in County (sq. mi.)	% County Area within FPA
Darke	14	65.0	600.4	10.8
Greene	12	195.7	416.2	47.0
Miami	11	201.8	409.2	49.3
Montgomery	17	352.2	464.3	75.8
Preble	11	55.1	426.3	12.9
Total	65	869.8	2,316.4	37.5%
Shelby	0	0.0	411.1	0.0

10.2.2 Population Projections

Policy E, Utilization of Areawide Population Projections, specifies that FP applicant's population projections must be consistent with MVRPC population projections as described in Section 3.1.

In 2013 MVRPC staff developed FPA-based population projections using 2010 Census figures and transportation planning data developed by the Ohio Department of Transportation and by the MVRPC Long Range Transportation Planning process. Population projections for 2040 were plotted for each facility planning area, as a guide for management agencies planning for future collection system extensions and treatment works upgrades. The projections, map and methodology description are incorporated into this AWQMP as **Appendix R**. MVRPC will look to update population projections using 2020 Census data in the coming years.

10.2.3 Development of Local Wastewater Management Options

The development of Wastewater Facility Plans and Plan Updates involves the identification of viable local wastewater management options or prescriptions. Policy D, Development of Local Wastewater Management Options, details the categories into which each FPA may be subdivided according to the type of wastewater treatment in existence, proposed and/or predicted.

Table 10-7. Wastewater Sub-Area Categories

Category	Description
1	Areas currently served with sanitary sewers
2	Areas expected to be served with sanitary sewers connected to an existing POTW during the next twenty years
3	Areas expected to be served with sanitary sewers connected to a new POTW in the next twenty years
4	Areas expected to remain on individual on-lot systems or semi-public systems, and where local officials are oriented to maintaining an unsewered status for the foreseeable future
5	Areas currently unsewered where local officials are oriented to accepting sewers if feasible and if found to be consistent with the AWQMP
6	Areas for which no wastewater management options have been declared

This policy provides the mechanism for encouraging DMAs to amend engineering plans based on the desire of a local government to manage growth within its jurisdictions. Wastewater management prescriptions should be aligned with local land use and/or comprehensive plans, where such plans exist.

10.2.4 Wastewater Treatment Facility Flow Data Review

In 2022 MVRPC staff requested and received from Ohio EPA Flow Rate data for every wastewater treatment facility serving the MVRPC Areawide Counties covering five years' worth of Discharge Monitoring Reports. Flow Rate is a daily report required under all NPDES permits for these facilities that tracks the volume of wastewater processed by the facility on a daily basis. Data is reported in millions of gallons per day (MGD).

Using a methodology designed to exclude outlier data, staff reviewed the data to assess typical daily throughput as compared to the Design Flow of the facility. By using five full years (60 months) of data, the review averaged out rainy months with dry months and wet years with dry years to provide a fair picture of typical operating conditions at each facility. Facilities were sorted into tiers based on typical daily flow rate as a percent of design flow. Facilities operating below 60 percent of design flow were considered to have no concern. Those typically operating between 60 and 80 percent of design flow were listed as "on watch." Those typically

experiencing daily flows above 80 percent of design capacity were listed as an “immediate concern.” Ohio EPA recommends DMA’s plan for a facility capacity expansion once flows regularly reach 80 percent of design flow.

Based on data from May of 2017 through May of 2022 there were 11 facilities listed as an immediate concern, including six major facilities (design flow greater than one million gallons per day) and five minor facilities (less than one MGD). The major facilities were those serving the following FPA: Beavercreek⁹, Franklin¹⁰, Tri-Cities, Troy, Union, and West Carrollton. The minor facilities were those serving the Ansonia/Rossburg, Bradford, Burkettsville/New Weston¹¹, Cedarville, and Lewisburg FPAs.

Flow rate assessments using this methodology have several uses in the wastewater planning process. Consideration of typical operating flows can be made when reviewing permit to install applications for new developments and extensions of sanitary sewer collection systems. See section 10.3 for a description of the PTI review process under the 208 Plan. Flow rate assessments can be made when proposals are made to adjust Facility Planning Area boundary lines to serve new developments. Projected new flows can be reviewed in light of available capacity at the receiving treatment facility. Comparative reviews can be made if multiple facilities may be able to serve the new development. In such cases planned future treatment capacity improvements should also be taken into account.

Finally, attention to flow rate change over time and the observed and projected impacts of climate change can be taken into account when planning for future upgrades to treatment capacity. Higher annual total precipitation and more frequent and more extreme precipitation events are predicted effects of global warming in Ohio, driven by increasing concentrations of greenhouse gases in the atmosphere.

MVRPC staff is available to assist communities in generating updated flow rate reviews to support local facility planning processes. The full methodology and findings for every facility in the Region are available in the full Flow Data Review report, which may be found as **Appendix S** to this 208 Plan.

⁹ The Beavercreek facility was re-rated to increase design flow to 10.6 MGD as of April 1, 2022. The Flow Data Review looked at data from years when the facility was rated at 8.5 MGD. Case study within the report highlights the re-rate process and resulting flow rates.

¹⁰ The Franklin WWTF serves Germantown and Carlisle within the MVRPC areawide planning area.

¹¹ Burkettsville/New Weston is served by the Village of St. Henry treatment facility in Mercer County.

Figure 10-1. Darke County Facility Planning Areas

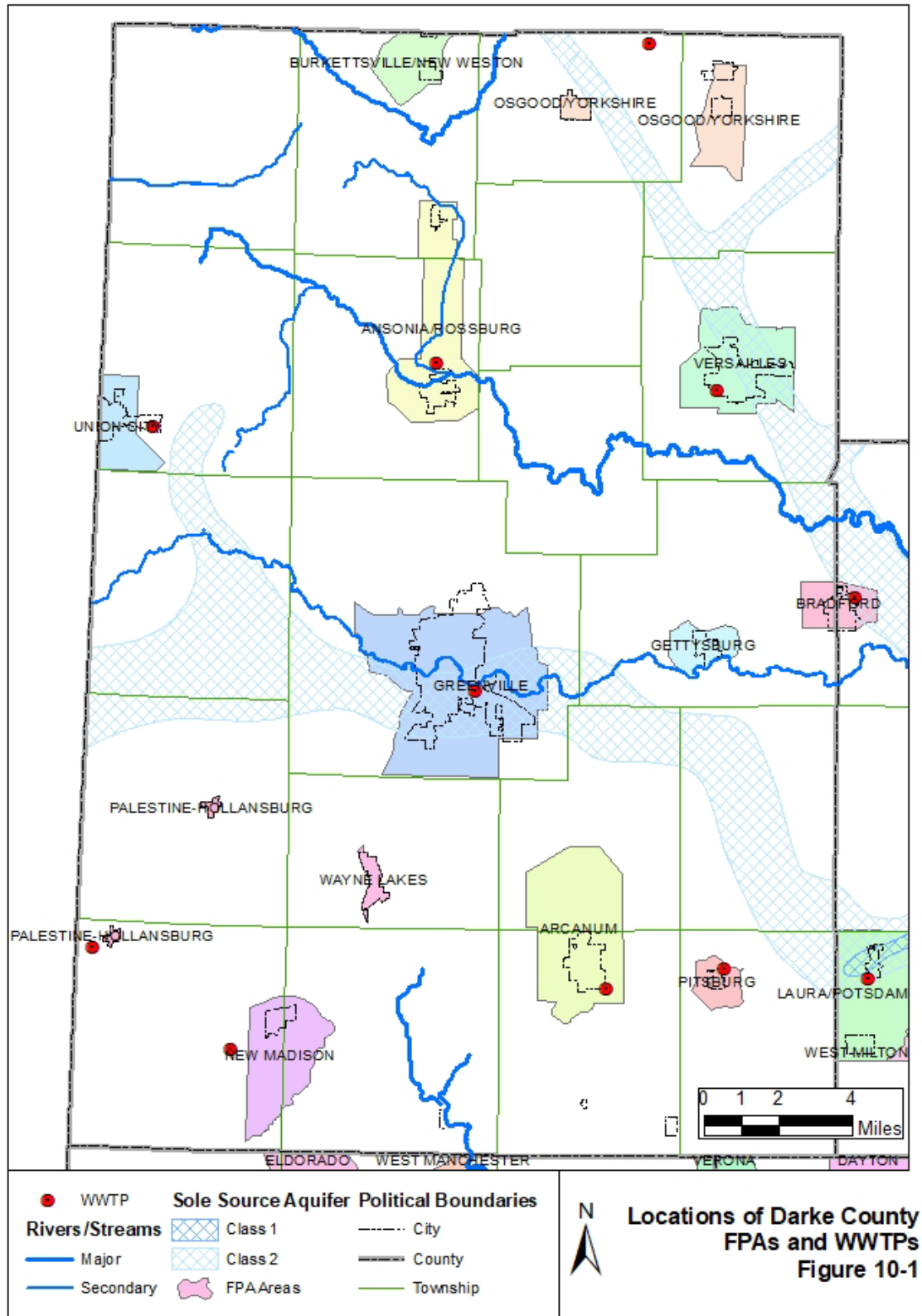


Figure 10-2. Preble County Facility Planning Areas

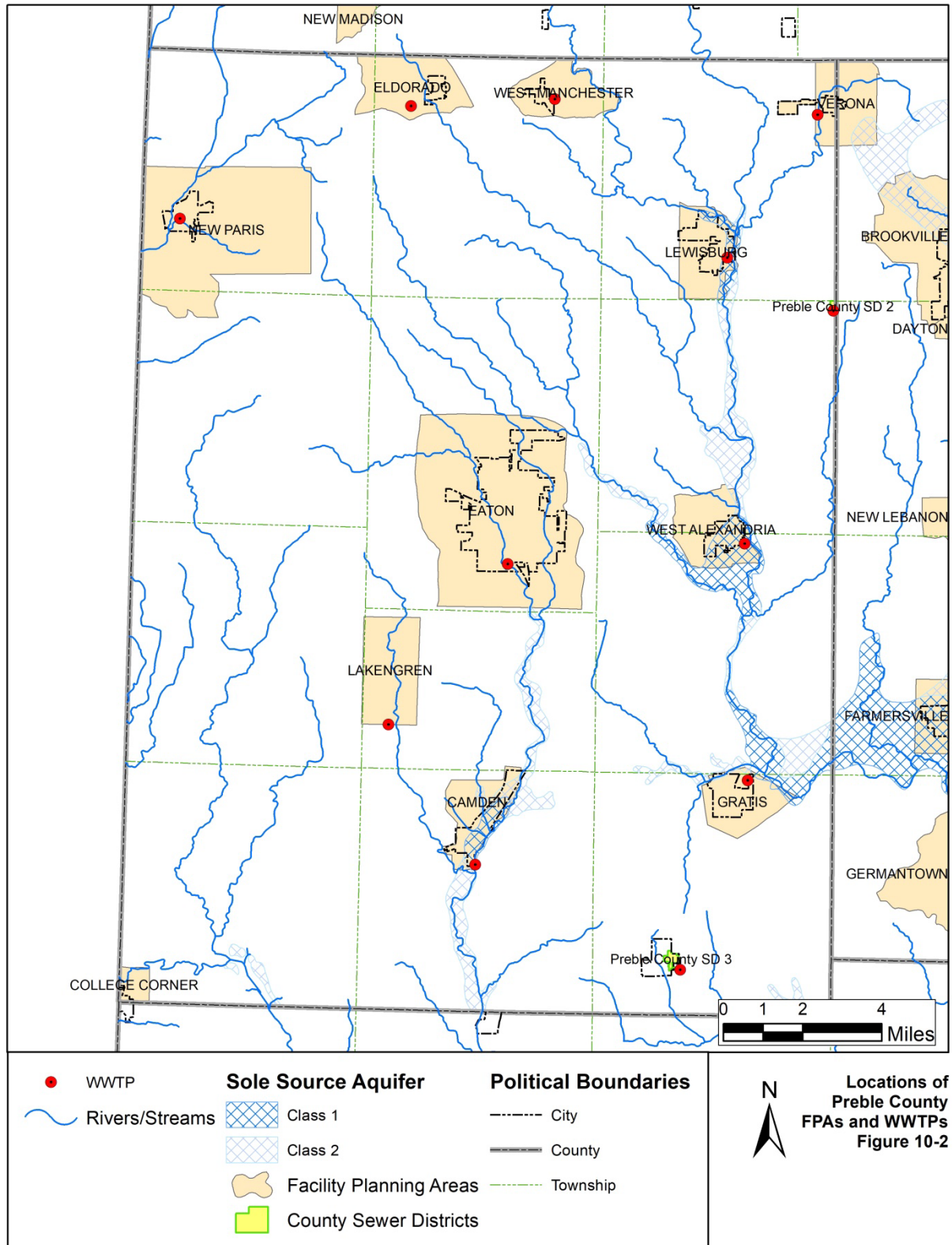


Figure 10-3. Miami County Facility Planning Areas

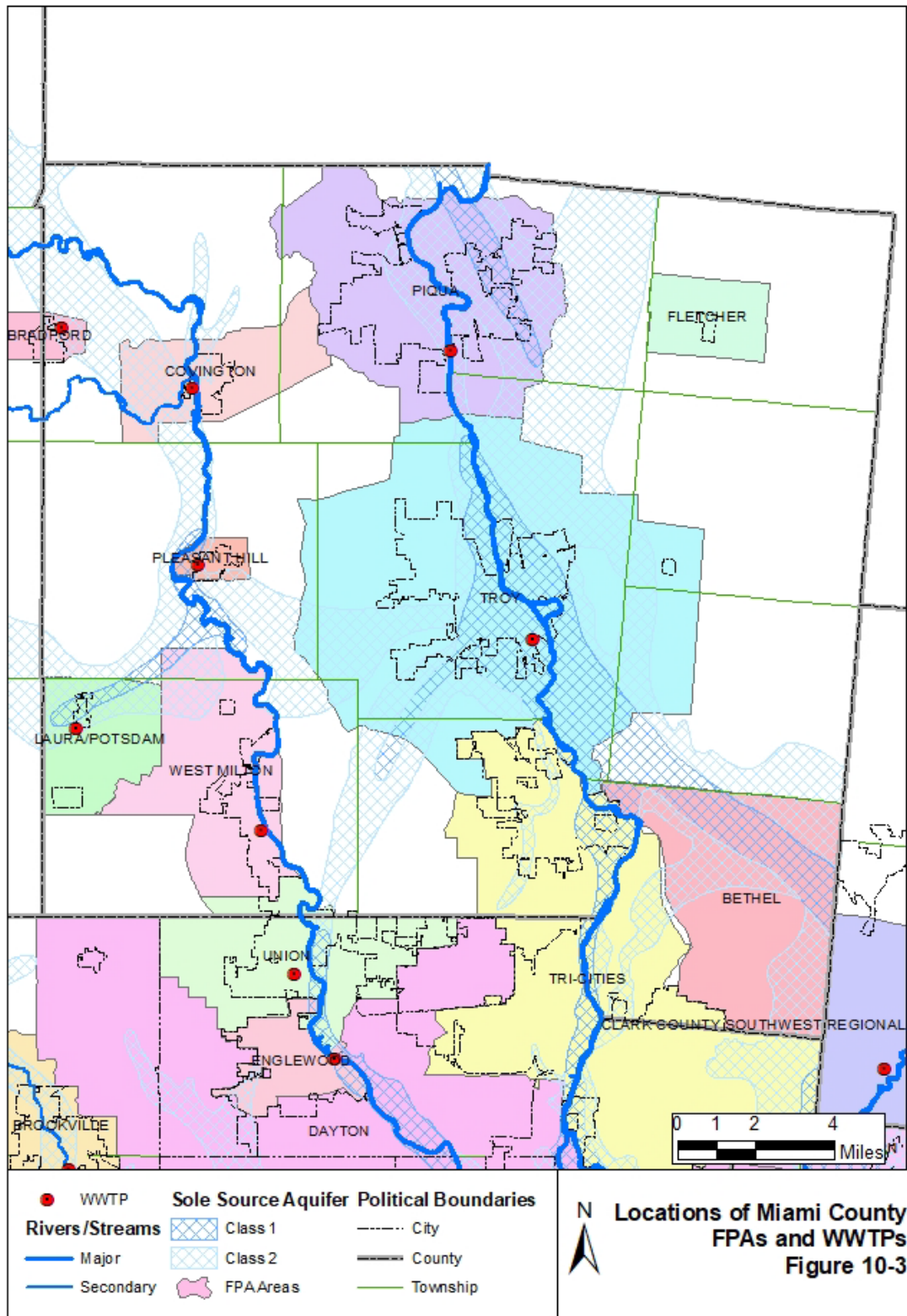


Figure 10-4. Montgomery County Facility Planning Areas

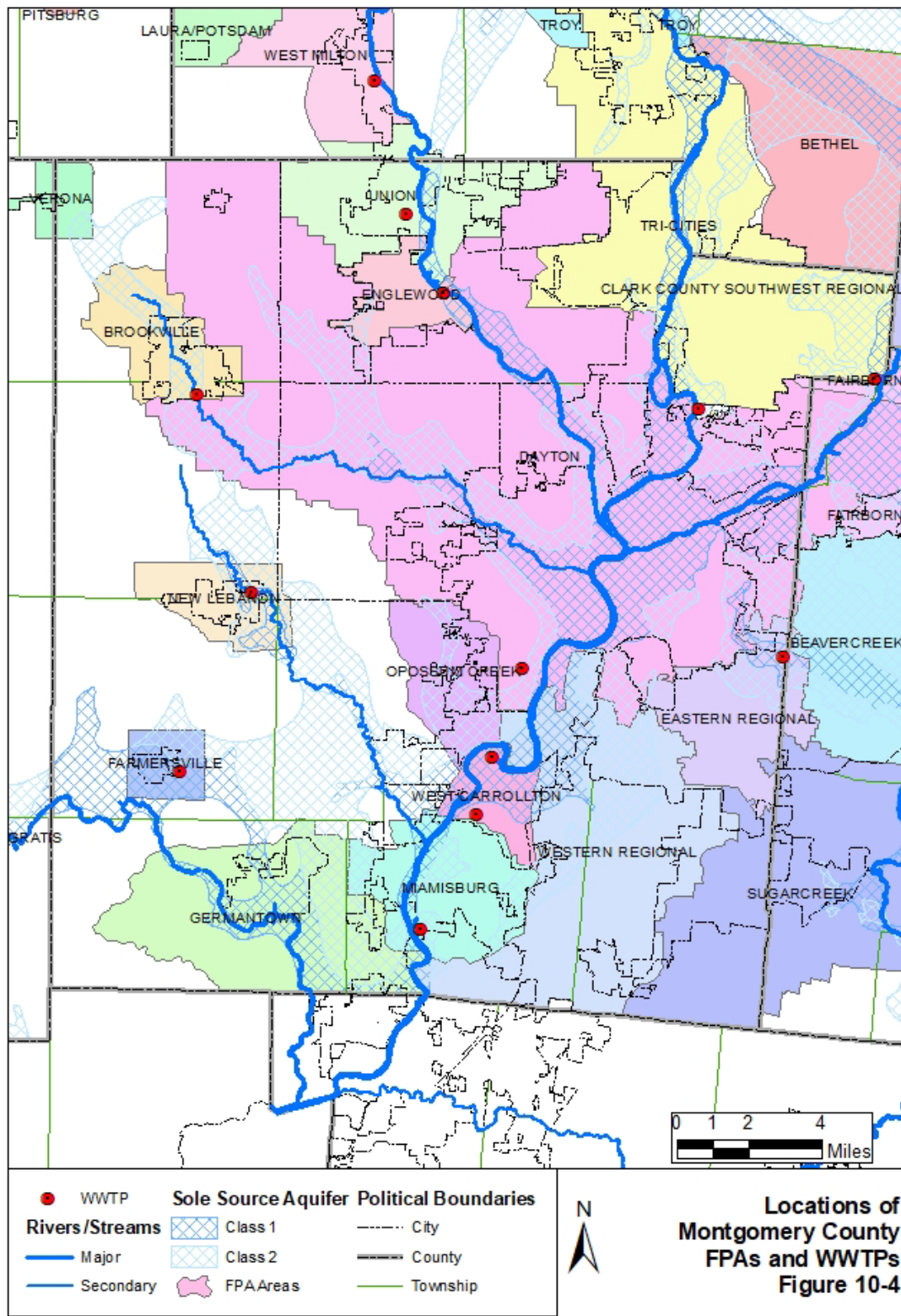


Figure 10-5. Greene County Facility Planning Areas

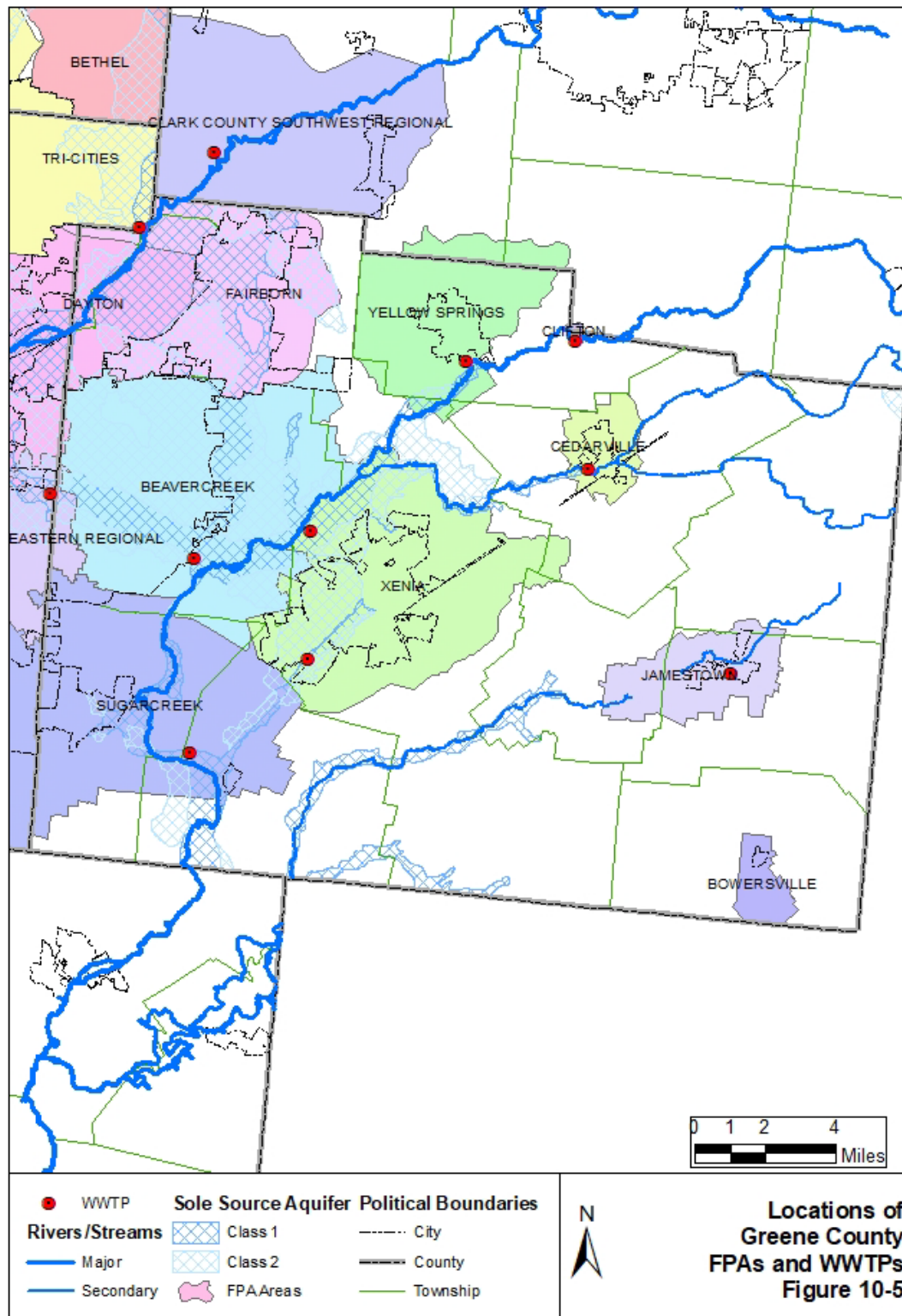
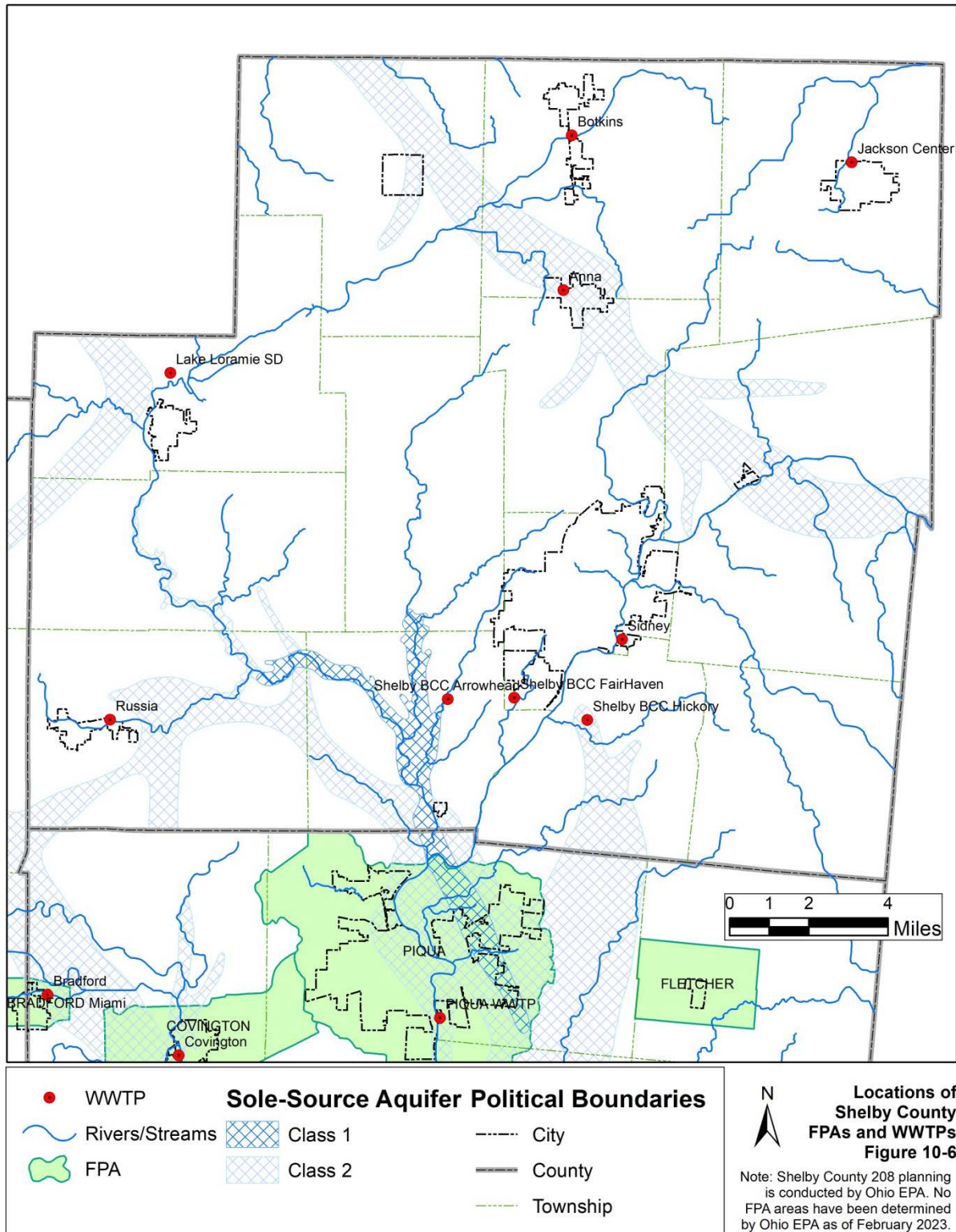


Figure 10-6. Shelby County Facility Planning Areas



Additionally, the policy outlines the conditions that must be met in those areas where local officials want to restrict wastewater treatment to individual on-site systems.

This policy recognizes the legal responsibilities and authorities of local health departments to influence wastewater treatment options.

10.2.5 AWQMP Consistency Reviews

Policy E, AWQMP Consistency Reviews, outlines the process under which DMA actions are reviewed by MVRPC. As described in Policy E, any action proposed by a DMA is considered consistent with the AWQMP as long as the following criteria are met:

1. Meets Ohio EPA's regulatory and technical requirements,
2. Consists solely of actions that are within the existing FPA boundary,
3. Consist solely of actions which are consistent with the wastewater prescriptions for the location, and
4. Conforms to accepted regional population projections.

Consistency reviews may also be conducted to review proposed private developments in advance of developing permit applications, as well as for individual permit to install applications.

10.3 OHIO EPA PERMIT TO INSTALL PROCESS

The Ohio EPA is responsible for issuing PTIs. A full explanation of the PTI application and review process is provided on Ohio EPA's website at: <https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/wastewater-permit-to-install-pti-program>.

The Ohio EPA tracks pending PTI applications on their website at: <http://wwwapp.epa.ohio.gov/dsw/pti/PtiStatus.htm>

MVRPC staff reviews PTI applications submitted for locations within the areawide planning counties. This 208 plan "pre-review" is designed to identify any consistency issues that may arise from the location and/or wastewater management option(s) proposed in the permit application. The review includes plotting the project location in relation to regional FPA boundaries, reviewing the project description in light of wastewater management options for the location, and ensuring that DMAs are aware of PTI applications which originate from entities other than the DMA itself.

10.4 ONGOING MAINTENANCE OF THE AWQMP FOR THE MIAMI VALLEY

Upon final adoption of this update to the Areawide Water Quality Management Plan, the Miami Valley Regional Planning Commission resumes the regular, ongoing responsibility to maintain the content of the plan to ensure that it addresses new developments in the state and federal regulatory environment, and local plans for development in the five county region. To accomplish this, MVRPC will continue to manage a process designed to facilitate dialogue between and among diverse water interests in the region, including jurisdictions, utilities, watershed groups, environmental groups, regulators, and MVRPC staff.

10.4.1 Meetings

All interested parties will be invited and encouraged to attend periodic watershed-based meetings in which current issues regarding the Plan content will be open for discussion. Currently existing meetings (the Great Miami River Watershed Network and the Little Miami Watershed Network) will be leveraged for their opportunities to foster dialogue regarding development and water resources. Jurisdictions proposing changes to Facility Plans or Facility Planning Areas within the AWQMP will be asked to make short presentations to the appropriate watershed meeting to describe the proposed change. Presentations on developments regarding groundwater protection, storm water management, agricultural BMPs and on-site sewage treatment management will also be encouraged so that the meeting participants can be informed on the broad range of water resource issues in the AWQMP.

10.4.2 Tours

Annually, in coordination with numerous agencies across the region, MVRPC will sponsor a “Best Management Practices Tour” of current and recent projects designed to protect or enhance water resources in the region. These tours will demonstrate the ongoing work of many agencies, with the intention of sharing ideas and approaches to water resource management across the region.

10.4.3 Content Review

In coordination with jurisdictions and agencies across the region MVRPC staff annually will compile necessary and requested updates to the content of the AWQMP for the review and consideration of the MVRPC Board of Directors. Any Designated Management Agency (DMA) may submit updates to the AWQMP relevant to their area of responsibility. Additionally, MVRPC staff may recommend updates to the AWQMP based upon regulatory changes, updates to ongoing projects and other similar developments that warrant a change to plan content.

10.4.4 Committee Structure

The MVRPC Areawide Facility Planning Subcommittee will have the responsibility of detailed review and comment on all proposed updates to the AWQMP for the Miami Valley. After the subcommittee’s review, proposed updates to the AWQMP recommended by the subcommittee will be forwarded to the MVRPC Technical Advisory Committee for review, and then the MVRPC Board of Directors for consideration for adoption. Updates approved by the MVRPC Board of Directors will be incorporated into the plan document, maintaining a single current plan report. The updated plan will be forwarded to Ohio EPA for state-level certification and incorporation into the state water quality management plan.

10.5 MVRPC RECOMMENDATIONS

During the 2010-2011 plan update process, MVRPC staff developed a policy suggested by some DMAs regarding modifications to Facility Planning Areas based on property annexation. The proposed policy was evaluated by the AFPSC and determined to conflict with MVRPC planning policies. Therefore, adoption of the proposed policy was not pursued.

Clarifying statements have been developed by MVRPC to the current Facility Planning Policies as follows:

- ORC 6117 and 6119 Sewer Districts can be useful tools for delivering sanitary services to areas in need of sewers and/or needing to disconnect from failing or underperforming on-site septic systems. Designated Management Agencies operating wastewater treatment facilities are encouraged to enter into satellite sewer services agreements to treat wastewater collected by sewer systems operated by 6117 and 6119 Sewer Districts, provided such arrangements can meet Ohio EPA permitting requirements. 6117 and 6119 Sewer Districts that have undertaken engineering planning for sewer design and financial planning for construction and long term operation and maintenance of a sewer system shall be given serious consideration for such satellite sewer service agreements.
- The Ohio Revised Code specifically anticipates the possibility that an area served by 6117 Sewer Districts may be annexed by a municipal corporation, and provides suggested mechanisms for compensating the Sewer District for infrastructure investments. See ORC section 6117.05. For this reason, anticipated or desired annexations should not discourage Designated Management Agencies from entering into satellite sewer service agreements with 6117 Sewer Districts. Rather, because future annexation interests are protected, priority should be given to delivery of sanitary services.
- MVRPC will coordinate with the Ohio Kentucky Indiana (OKI) Planning Commission and/or Ohio EPA to ensure issues involving FPAs that overlie County boundaries and extend beyond the MVRPC areawide planning area will be appropriately addressed by all necessary planning agencies.