

**RESPONSE SUMMARY TO PUBLIC COMMENTS
ON THE DRAFT TMDL REPORT
PORTAGE RIVER WATERSHED**

Portage River Watershed TMDLs

The draft Portage River Watershed Total Maximum Daily Load Report was available for public review from July 15 through August 15, 2011. One set of comments was submitted by Mr. Lawrence A. Szuhay of the Materion Corporation on August 12, 2011.

This appendix contains the comments received and responses to those comments. Please note that references to page numbers in the draft report may not correspond to the same page numbers in the final report.

Comment

Materion Brush Inc. (Materion Brush) is pleased to submit these comments on the July 15, 2011 Draft Total Maximum Daily Load (TMDL) Report for the Portage River Watershed.

Materion Brush operates a manufacturing plant in Elmore, Ohio, which produces beryllium, beryllium alloys, and beryllium oxide. Materion Brush is a major employer in Ottawa County and, along with its over 500 employees, is a leading economic and civic contributor to the entire region.

Materion Brush environmental stewardship has long been demonstrated at its Elmore plant, which began operation in 1958. Materion Brush has implemented many plans to eliminate, reduce and control wastewater discharges from its Elmore plant. Materion Brush operates an advanced wastewater treatment plant for treating its process wastewater before it is discharged into the Portage River. Pursuant to NPDES permits that have been issued by the Ohio EPA for the Elmore plant, Materion Brush has conducted various water quality studies of the Portage River. A notable example is the January 1991 study conducted by EA Engineering, Science and Technology, which is titled "Results of Biomonitoring Studies of the Portage River Near the Brush Wellman Elmore Plant 1990." This study concluded that the discharges from the Elmore plant were not significantly impacting the Portage River aquatic communities. This conclusion was consistent with the finding of a similar biomonitoring study conducted of this area by the Ohio EPA in 1985. Since these studies were conducted, Materion Brush has made many additional improvements in its wastewater control technology and practices. These studies, the reports referred in Table 6-7 of the draft TMDL report, and other knowledge provide Materion Brush with an informed perspective and understanding of the water quality issues in the Portage River watershed, especially the Lower Portage River.

Materion Brush generally agrees with and supports the actions to improve water quality identified in the draft TMDL Report. As summarized in the Fact Sheet for the draft TMDL Report, "the most important "fixes" in the watershed" are:

- **Reduce amount of inadequately treated sewage from home septic systems**
 - *Work with homeowners to identify deficiencies with the condition and/or operation of their systems*
 - *Provide centralized sewer collection and treatment services to some areas where feasible*

 - **Reduce pollutant loading from waste water treatment systems**
 - *Reduce phosphorus loading from waste water treatment plants*
 - *Fix waste water collection system to reduce and/or eliminate overflows of untreated sewage*

 - **Reduce sediment and nutrient loading from the landscape, especially cropland**
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- *Protect soil surface with cover crops and residues which also tie-up nutrients*
- *Increase the retention of water in treatment areas such as wetlands, filter strips, or in the soil profile with controls on subsurface drainage systems*

- **Improve the quality of stream channels and their corridors**
 - *Facilitate floodplain connection and growth of riparian trees and vegetation*

These restoration actions are identified with greater specificity for each section of the watershed, including Portage River 05-02 where Materion Brush's plant is located. With respect to the recommendations for this section of the Portage River, Materion Brush agrees with the Ohio EPA's conclusion in Section 6.6.2 that reduction of "nutrients for the sites in the Portage River will largely depend on reductions made upstream in the watershed." With respect to the specific restoration actions for Portage River 05-02, which are contained in Table 6-6, Materion Brush agrees with these recommendations, with one possible exception. One of the recommendations is to "improve quality of effluent." This recommendation evidently relates to the point source wasteload allocation strategy for facilities identified in the Tables 5-42, 5-45 and 5-46, Section 5 of the draft TMDL Report. To Materion Brush's knowledge, none of these facilities identified in these Tables are located in the watershed section described in Table 6-6. Hence, that one recommendation should be deleted from table 6-6, unless the intent of this recommendation is to describe actions to be taken by upstream facilities, which does not seem to be the purpose of Table 6-6.

Response

Ohio EPA appreciates the commenter's attention and input to the TMDL process. Regarding the issue raised about Table 6-6 and restoration actions for hydrologic unit code (HUC) 04100010 05 02, the effluent referred to is the Village of Gibsonburg, which straddles two of the HUCs in the Portage River watershed. The wastewater treatment plant is located in Wolf Creek (04100010 05 02), but the system has combined sewer overflow (CSO) and effluent discharges that impact both Wolf Creek and Sugar Creek (04100010 04 01). Thus, the total phosphorus wasteload allocation is split between the two hydrologic units. Notes to explain the approach are included on Tables 5-34 and 5-42. It is appropriate to include the recommendation to improve the quality of effluent from point source(s) in both Tables 6-5 and 6-6. To alleviate your concern, "(Gibsonburg)" has been added to Table 6-6 to clarify which facility is intended.

Materion Brush is encouraged to continue supporting environmental stewardship and also consider becoming active in the Portage River Basin Council, a local watershed group that has been working to protect and enhance the Portage River resource for more than 15 years. More information about the Basin Council can be found on the Toledo Metropolitan Council of Governments website at <http://www.tmacog.org/prbc.htm> .