

## ***DRAFT COMMENT LETTER***

OEPA, Lazarus Government Center  
Division of Surface Water Permits Processing Unit  
50 West Town St., Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear review committee,

This letter is for the purposes of commenting on Public Notice No: OEPA 11-12-004 DFT concerning NPDES Permit No: 3PE00008\*ND.

We are opposed to TDS limits being established for communities such as Warren that are not science based. We believe that limits should only be established after a science based study is conducted that gathers and reviews credible evidence that first determines if a pollutant parameter is not being achieved.

It is our understanding that OEPA has very limited, if any, documented TDS data that accurately demonstrates that a water quality problem existed mandating the need for limits to be established. It is also our understanding that the current limit is being established based on assumed numbers and that accurate, scientifically gathered data collected by the City of Warren is being ignored. It is our understanding that Warren's data, gathered weekly for over a year, demonstrates that no water quality parameters are being violated within the State limits of the Mahoning River watershed which is part of the Ohio River watershed.

As a discharger to the Ohio River watershed and/or waters of the state, we are concerned that such actions by OEPA place an economic burden on our community that will deter future growth and may force our existing businesses to seek other communities that have less restrictive limits imposed on them by state agencies.

To that end, we oppose the TDS limit being established in this permit until a legitimate science based study has been completed that demonstrates that current discharge limits are not sufficient enough to meet water quality standards.

Sincerely,