

To ensure PTI applications do not conflict with NOACA's 208 Plan, NOACA staff conducts PTI 208 Plan Reviews for applications submitted to Ohio EPA within the NOACA region. Under the State Fiscal Year 2017 (SFY17) Biennium Budget Funds contract with Ohio EPA, NOACA led a collaborative effort among Areawides and Ohio EPA staff to develop minimum standards for PTI 208 Plan Reviews. Through these standards, NOACA produced the following standard operating procedure (SOP).

Permits-to-Install (PTIs) Reviewed

- Each week, Ohio EPA sends NOACA staff a list (via email) of PTI applications received the previous week.
- NOACA staff conducts a 208 Plan Review on all PTI applications within NOACA's region (Cuyahoga, Geauga, Lake, Lorain and Medina counties).
- NOACA staff will conduct a 208 Plan Review for PTI applications outside NOACA's region upon request from Ohio EPA.

Review Procedure

- NOACA staff checks each PTI application for conflicts with NOACA's 208 Plan.
- 208 Plan information reviewed for each PTI application includes, but is not limited to, Facility Planning Area (FPA) Boundaries and Prescriptions for Wastewater Treatment (Prescriptions).

Review Timeline

- NOACA staff make its best effort to complete PTI 208 Plan Reviews within five days receipt of the list of PTI applications from Ohio EPA.
- NOACA staff guarantee PTI 208 Plan Reviews within 14 days after they receive the list of PTI applications from Ohio EPA.

Communication with Ohio Environmental Protection Agency (Ohio EPA)

- NOACA staff will email or call the Ohio EPA contact listed for a PTI application if there is not sufficient information (location, project description, etc.) to complete a review.
- NOACA staff will email the listed Ohio EPA contact **and** Ohio EPA Northeast District Office (NEDO) Division of Surface Water Manager about PTI applications:
 - o That may conflict with NOACA's 208 Plan. The email will include:
 1. A narrative that describes the potential 208 Plan conflict
 2. Relevant maps and Prescriptions information



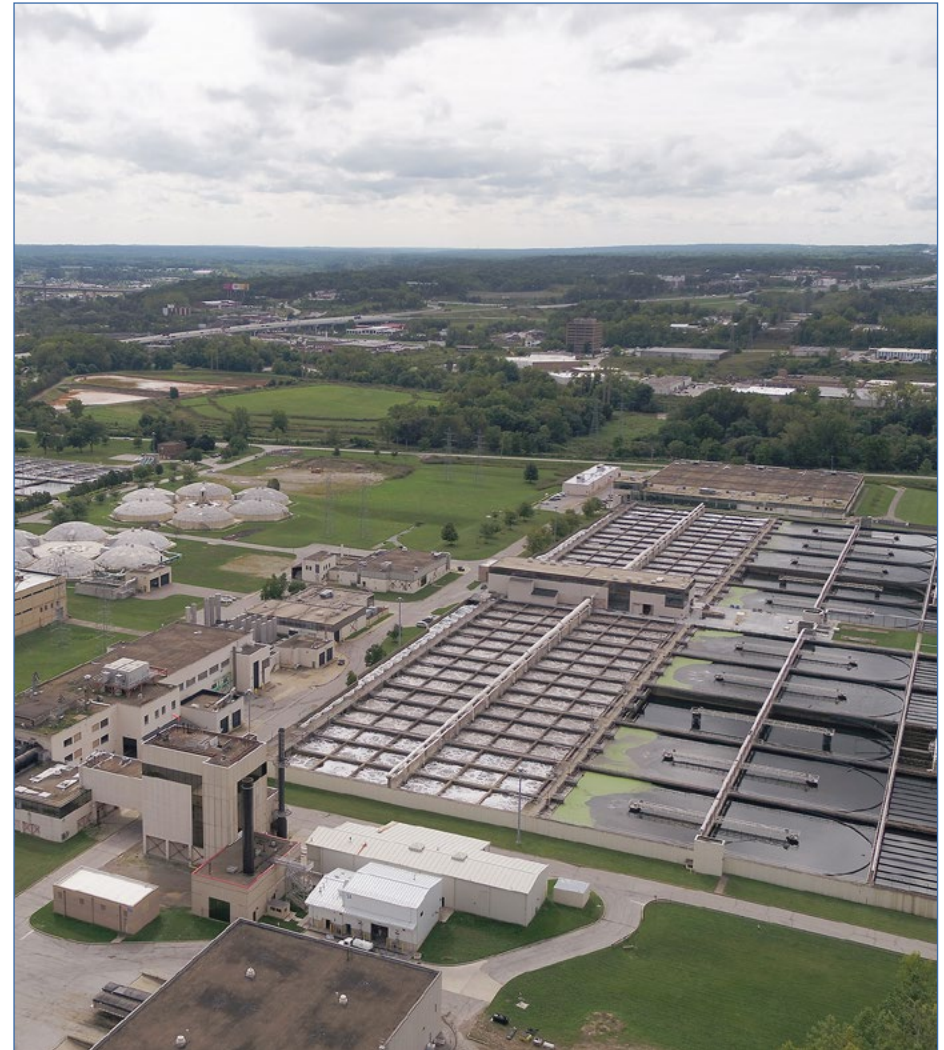
- o Within 1,000 feet of a FPA Boundary. The email will include:
 1. A narrative that describes the close proximity of the PTI application to a FPA Boundary
 2. Relevant maps and Prescriptions information
- NOACA staff will email or call the Ohio EPA NEDO Division of Surface Water Manager if there are circumstances that prevent the completion of one or more PTI 208 Plan Reviews within 14 days after receipt of the PTI applications from Ohio EPA.
- NOACA staff **will not** contact Ohio EPA for PTI applications deemed not in conflict with NOACA's 208 Plan.

NOACA's Determination of 208 Plan Conflicts

- NOACA's role is to help Ohio EPA determine potential conflicts of PTI applications with NOACA's 208 Plan. Ohio EPA Division of Surface Water will determine if a PTI application is consistent with NOACA's 208 Plan.
- If a PTI application is deemed in conflict with NOACA's 208 Plan, the Division of Surface Water will notify the applicant about the consistency issue.

Update of NOACA's Permit-to-Install (PTI) 208 Plan Review—Standard Operating Procedure (SOP)

- NOACA staff will annually review the PTI 208 Plan Review—SOP with Ohio EPA NEDO staff to determine if updates are necessary.



Southerly Wastewater Treatment Plant, Photo courtesy of NEORSD

