



State Water Quality Management Plan

including Section 208 Areawide Waste Treatment Management
Plans



Lancaster Water Pollution Control Facility

Division of Surface Water
Final Report

October 17, 2025

New State Water Quality Management Plan (208 Plan)

NOACA Water Quality Subcommittee December 19, 2025

Eric Akin

Division of Surface Water

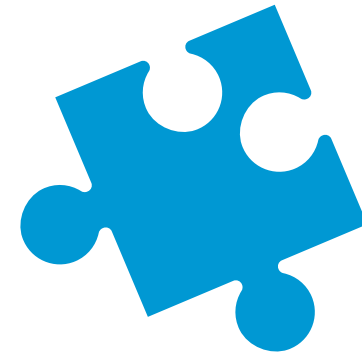
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614-644-2013



**Environmental
Protection
Agency**

STATE WATER QUALITY MANAGEMENT PLAN & 208 PLAN BACKGROUND



208 Plan: Background

1972 Clean Water Act (CWA) - Sections 201, 205, 208, and 303

Water Quality Management Plan – Sec. 208 and 303

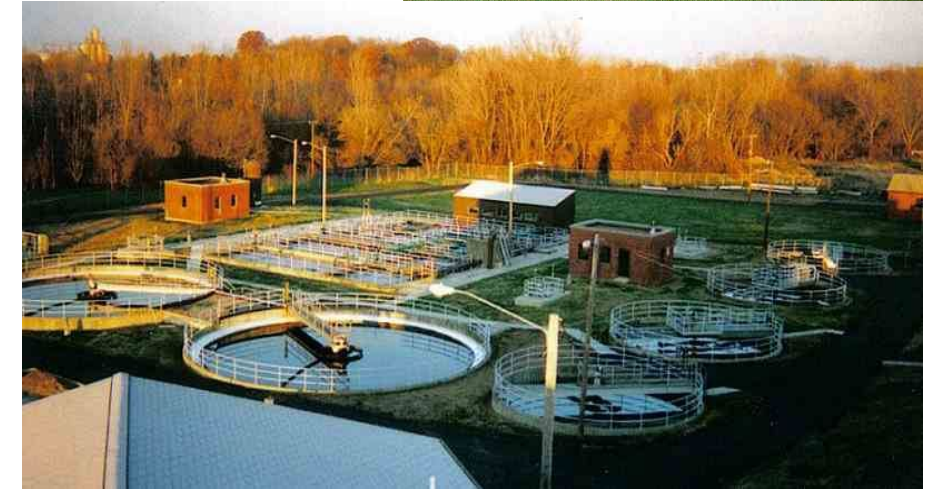
Section 208 = Areawide Waste Treatment Management

“208 Plans” for Treatment of Water and Pollution Control



208 Plan: Background

- **Wastewater Issues that Might Impact Water Quality**
 - Sewage Collection/Treatment
 - Stormwater
 - NPS Pollution
- **Regional (Areawide) Analysis**
- **Implemented by Multiple Agencies**
- **Required in Ohio**



Areawide Planning Agencies

- Governor Appointed
- 6 Agencies - 24 Counties
- Ohio EPA Plan - Rest of Ohio (64 Counties)
- Maintain Separate 208 Plans
- Areawides' 208 Plans Included by Reference in State 208 Plan
- State 208 Plan = Ohio EPA 208 Plan + 6 Areawide 208 Plans



Government Agencies Responsible for 208 Plans



Ohio EPA 208 Plan – Areawide 208 Plans

208 Plan Component	Ohio EPA 208 Plan	Areawide 208 Plans
Number of Counties	64	24
Dedicated Staff	1+	6+
Governor Certification and U.S. EPA Approval	Yes	Yes
Approval of Wastewater Changes for Existing FPAs	Ohio EPA Director	Governing Board
Existing Regional/County Water Quality Conditions	Yes (but dated)	Yes
Management of NPS Pollution/Stormwater	Yes*	Yes
Population Projections	No	Yes
Optional Elements	No	Yes

* Primarily included by reference & Darby Protection Prescriptions



208 Plans: Implementation

Applications Conflicting with 208 Plans Cannot be Approved

- Permits-to-Install (PTIs)
- National Pollutant Discharge Elimination System (NPDES) Permits
- Water Pollution Control Loan Fund (WPCLF) Construction Monies

**Ohio EPA Approvals Reflect the Community's Desires
Documented in the 208 Plan**



208 Plan: Background

1972 Clean Water Act (CWA) - Sections 201, 205, 208, and 303

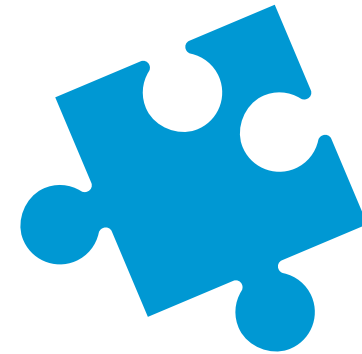
Water Quality Management Plan – Sec. 208 and 303

Section 208 = Areawide Waste Treatment Management

“208 Plans” for Treatment of Water and Pollution Control



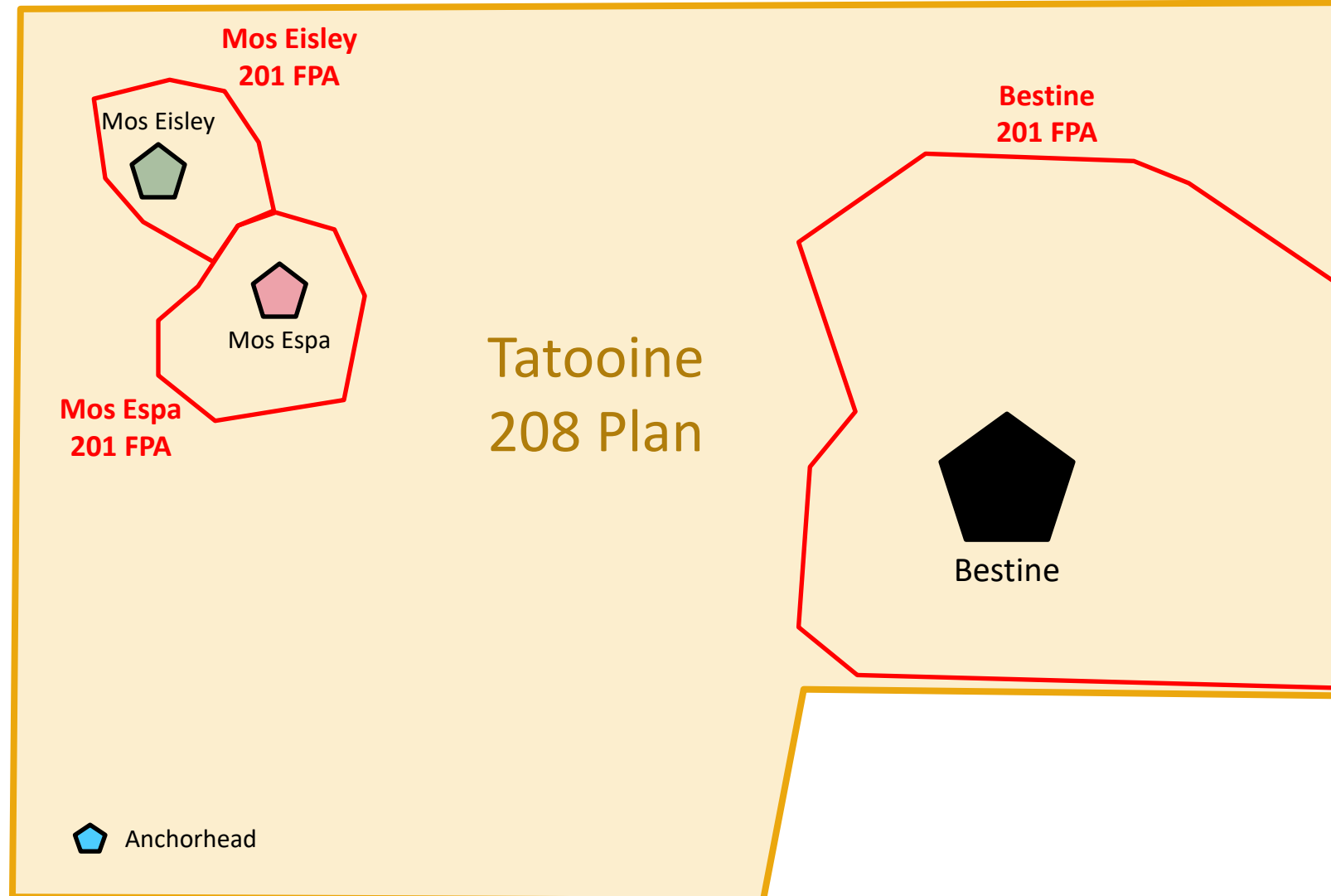
HOW DID FPAs BECOME A 208 PLAN KEY COMPONENT?



Clean Water Act: 201 Facility Planning Maps & 208 Plans

1972 – Mid 1980s

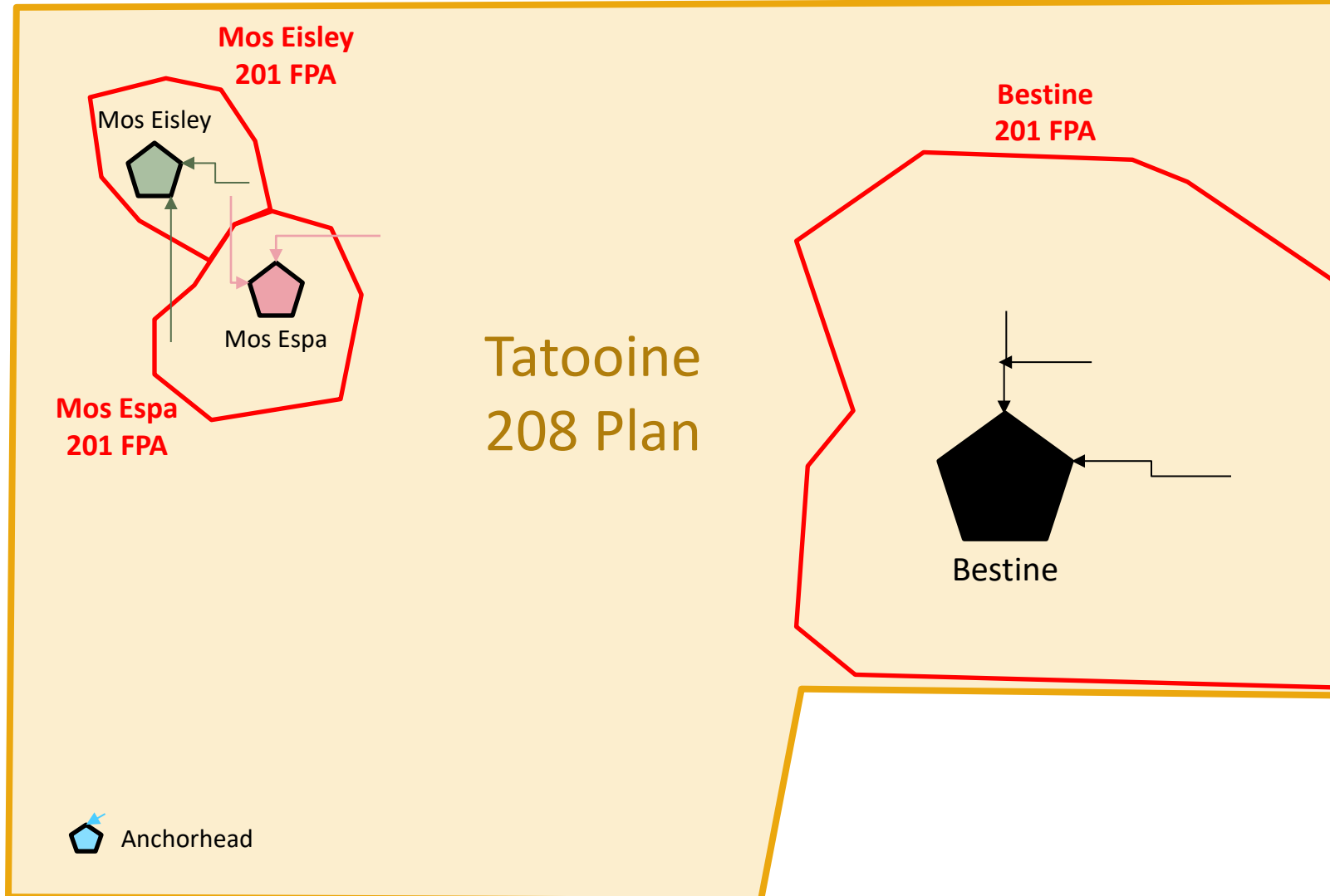
- **Established:** 208 Planning Areas
- **201 Construction Grants:** 75% of Sewage System Costs
- **Funding Requirement:** 201 Facility Planning Areas (FPAs)
- **Linked:** 201 FPAs & 208 Plan



Clean Water Act: 201 Facility Planning Maps & 208 Plans

Mid 1980s - 1990

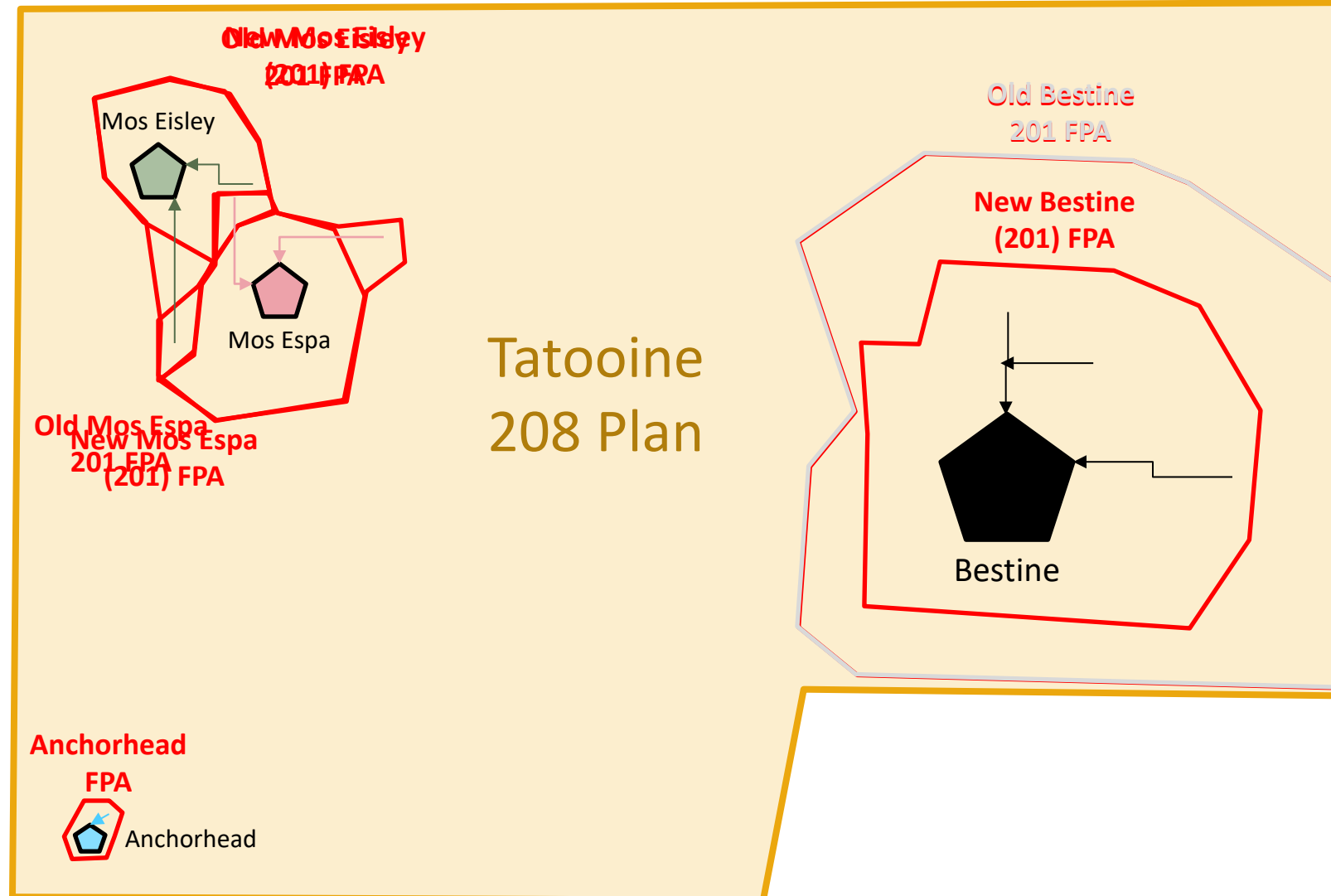
- **Policy Change:** Section 201 Construction Grants to Revolving Loan Fund (WPCLF)
- **Ignored:** 201 FPAs
- **Continued Development:** Sewer Extension & Permitting Decisions Made without 201 Maps/208 Plans



Clean Water Act: 201 Facility Planning Maps & 208 Plans

1990 – Mid 2000s

- **Court Ruling:** 208 Plan Implementation is Nondiscretionary
- **Consent Decree:** Update 208 Plans & FPAs within 208 Planning Areas
- **Affected Agencies:** Ohio EPA and Areawides
- **Annual Updates**



Clean Water Act: 201 Facility Planning Maps & 208 Plans

- **Takeaways**

- 201/208 interaction unique to Ohio (at least in the Midwest)
- Mainly applies to areas where 201 Facility Plans overlap with approved 208 Plans (urban regions)
- Limited FPAs outside of 208 Planning areas
- 208 Plans with FPAs must be maintained
- Permit and funding implications



208 Plans: Key Wastewater Components

- Management Agencies
 - Facility Planning Areas (FPAs)
- Prescriptions for Wastewater Treatment (Prescriptions)
= Section 201 Planning Components

A project that conflicts with one or more of these components will be denied a PTI and/or NPDES permit



Permit-to-Install Application

- **ePlans Question – Form A**
 - Yes, No, or Not Applicable
- **Documentation Options**
 - Letter/Email from Areawide
 - Current Detailed Map
- **Resources**
 - Areawide Staff and Online Maps
 - Ohio EPA Staff and Online Map
- **Compliance Verification**
 - Weekly Review
 - Ohio EPA District Staff and Appropriate Areawide Staff

Location Parcels (Limit of 14 characters)

Additional Information

Compliance with 208 Plan

Does this conform to the 208/201 plan for the area? *

Note: [Ohio EPA cannot approve PTIs that do not conform to the 208 plan per rules and regulations.](#)

Compliance Status

Will this connect to a collection/treatment system that has an NPDES permit? *

Is this Application filed in compliance with any of the following?

Consent Decree

Findings and Orders

NPDES Permit Schedule

Not Applicable

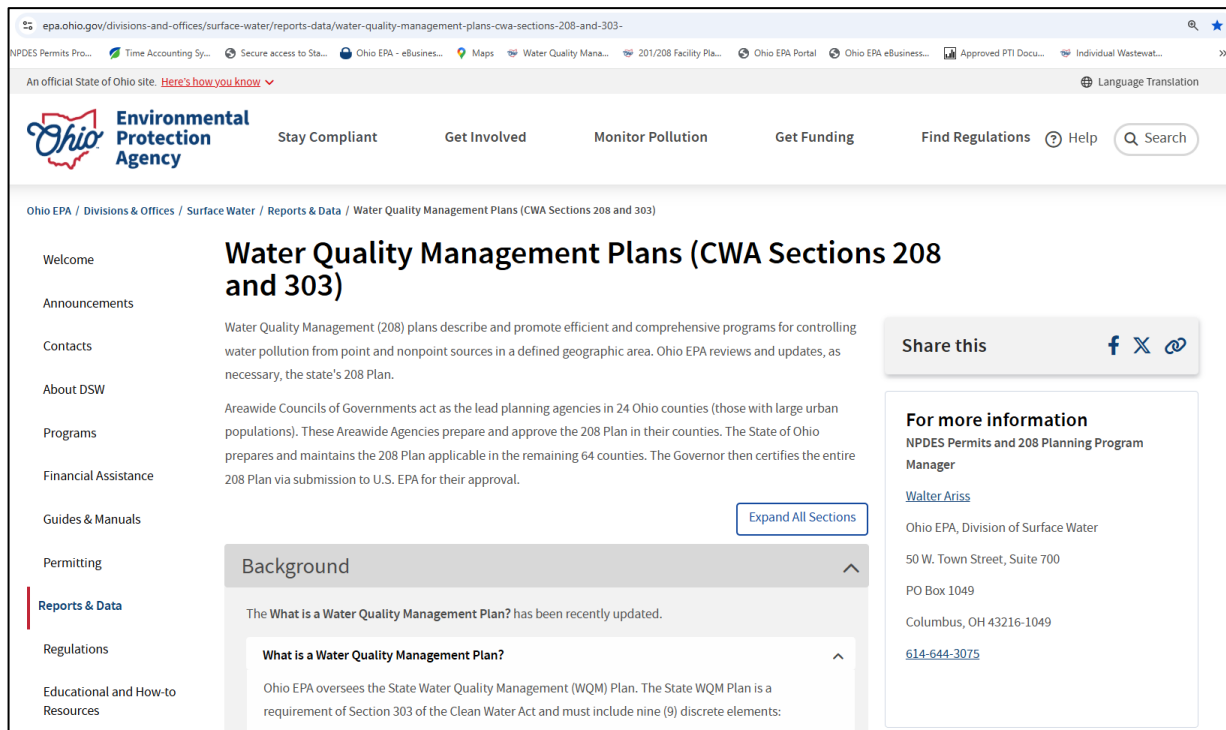


Ohio EPA 208 Plan Webpage & App

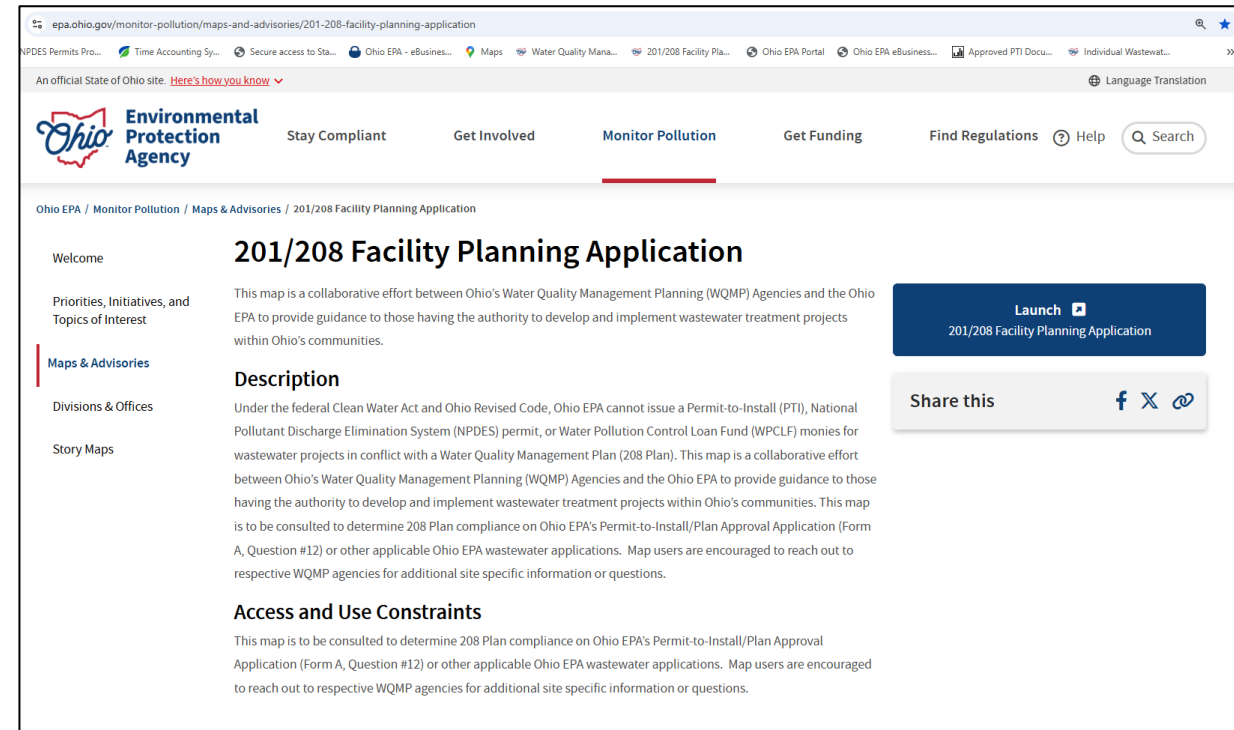
Google Search: "Ohio EPA 208 Plan"

State 208 Plan Webpage

201/208 Facility Planning App

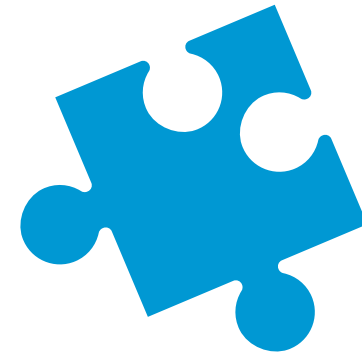


The screenshot shows the Ohio EPA website page for Water Quality Management Plans (CWA Sections 208 and 303). The page features a navigation menu with options like 'Stay Compliant', 'Get Involved', and 'Monitor Pollution'. The main content area includes a 'Background' section with a 'What is a Water Quality Management Plan?' sub-section, a 'Share this' button, and a 'For more information' section with contact details for the NPDES Permits and 208 Planning Program Manager, Walter Ariss.



The screenshot shows the Ohio EPA website page for the 201/208 Facility Planning Application. The page features a navigation menu with options like 'Stay Compliant', 'Get Involved', and 'Monitor Pollution'. The main content area includes a 'Description' section, an 'Access and Use Constraints' section, and a 'Launch' button for the 201/208 Facility Planning Application.

STATE AND OHIO EPA 208 PLAN



State 208 Plan: 2025 Update



Update Highlights

- First update since 2006
- Streamlined document
- User/online friendly
- Referenced Ohio EPA reports
- Updated information and terminology
- Updated county tables (FPAs, MAs, NPDES permits, etc.)
- **New Modification Process**

Ohio EPA 208 Plan: Modification Process

- **New FPAs and Prescriptions**
 - Governor Certification & U.S. EPA Region 5 Approval
- **New Management Agencies**
 - Approved by Ohio EPA Staff
- **Existing FPA and Prescriptions Modifications**
 - Approved by Ohio EPA Director
- **Petition for Existing FPA and Prescription Change Requirements:**
 - **Existing MA:** Supports the change, unable/unwilling to provide service, or has unacceptable conditions
 - **Alternative Sewer Plan:** Protective, achievable, and economical
 - **Written Support:** Affected jurisdictional entities



Ohio EPA 208 Plan: New Modification Process – Continued

- Completion of ALL Facility Planning Work
- Ohio EPA Will Not Validate a Petition IF the Existing MA Can Demonstrate:
 - Significant Impacts to System Affordability
 - Inability to Meet NPDES Permit Limits
 - Violation of WPCLF Funding Condition
- Ohio EPA Organized Meeting(s) if No Consensus



Ohio EPA 208 Plan: New Modification Process – Approval

- **Valid Petitions: Ohio EPA 30-Day Public Notice**
- **Final Determination: Ohio EPA Director**
- **Effective: Upon Director's Approval**
- **208 Plan Update: Next Annual Certification**
- **Ohio EPA 208 Plan Adjustments: Petition Not Required**
- **State Water Quality Management Plan: Chapter 8**



Ohio EPA 208 Plan and Facility Plans Questions

Do all Facility Plans need to be included in the Ohio EPA 208 Plan?

- **NO**
- **HOWEVER**, only facility plans recognized in an approved 208 Plan must be considered by Ohio EPA for wastewater applications.

Can any management agency within Ohio's 64 counties request its Facility Plan be included in the Ohio EPA 208 Plan?

- **YES**
- **HOWEVER**, the management agency must submit required facility plan information to Ohio EPA for review and approval.



Ohio EPA 208 Plan: Facility Planning Guidance

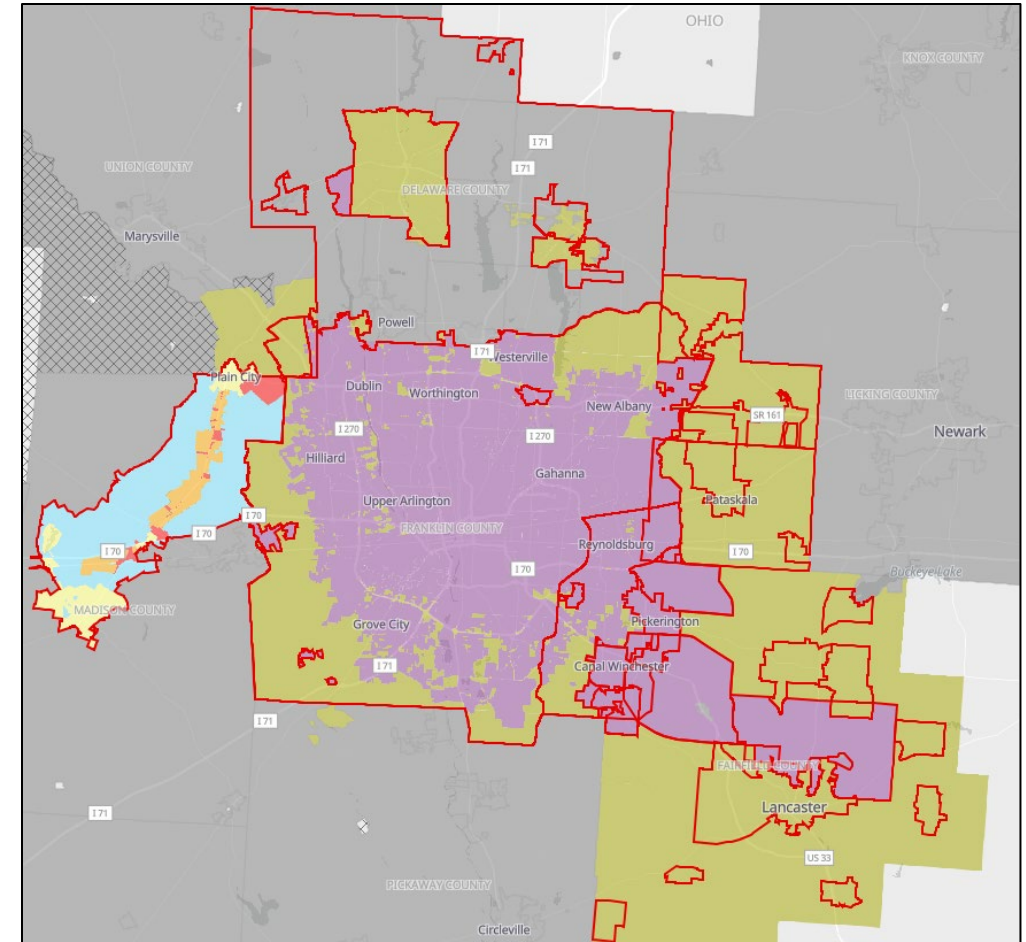
Planning Step	Materials Submitted in the Facility Plan to Ohio EPA
1. Delineate Current Service Area	Provide up-to-date maps of the current sewer service area with all trunk lines and pump stations shown. If possible, these maps should be in a standard GIS format, or a CAD format transferable to GIS software.
2. Evaluate Sewer System Conditions	Identify needed improvements; Provide cost estimates.
3. Evaluate Need for Additional Sewer Service	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).
4. Delineate Projected Service Area	Forecast and map new areas expected to be sewerred in the next 20 years (projected service area); provide cost estimates.
5. Develop Prescriptions for Wastewater Treatment in Areas Without Sewers	Evaluate options and select interim prescriptions for areas expected to be sewerred within 20 years; Evaluate options and select permanent prescriptions for areas not expected to have sewers.
6. Evaluate Wastewater Treatment Capacity	Itemize improvements, if any, to meet current needs (population now served) and provide cost estimates.
7. Determine Future Capacity Need for Treatment	Forecasts of population growth and other demands used to assess the treatment capacity needed in next 20 years.
8. Evaluate Future Wastewater Treatment Capacity Options	Identify feasible alternatives, select most likely option(s); Itemize improvements to meet future needs and provide cost estimates.
9. 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):
10. Qualify as Management Agency	Agree to provide services indicated in 208 plan; Obtain written agreements with other governmental jurisdictions if service involves more than one jurisdiction.

- Information Needed for Inclusions in the Ohio EPA 208 Plan
- 10 Planning Steps
- Evaluation of Current/Planned System
- Determine Future Capacity Needs
- Set FPA and Future Service Areas*
- Establish Prescriptions*
- Agreements for Regional Service*
- Table 3-1



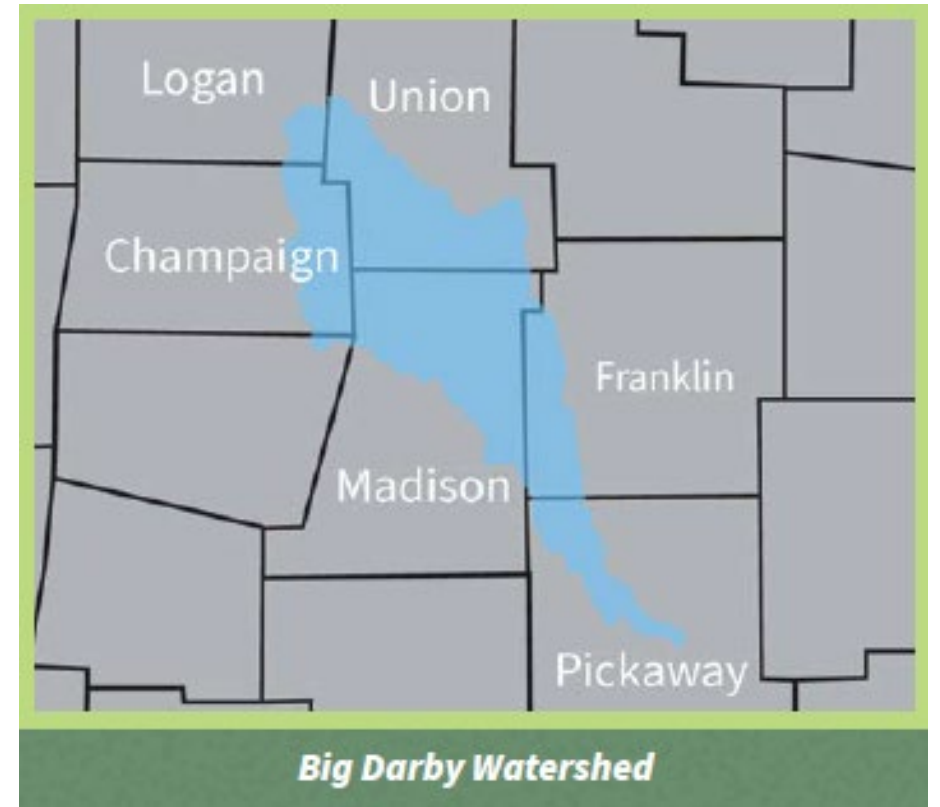
Ohio EPA 208 Plan: Generic Prescriptions (GPs)

- **Nine GPs: Gray map areas**
- **Appendix 3-1**
- **Wastewater Collection and Treatment**
- **Minimal Legal Authorities and Responsibilities**
- **GPs Recommended: Areas with Minimal Wastewater Options**
- **GPs Not Recommended: Areas with Development Pressures or Multiple Service Providers**



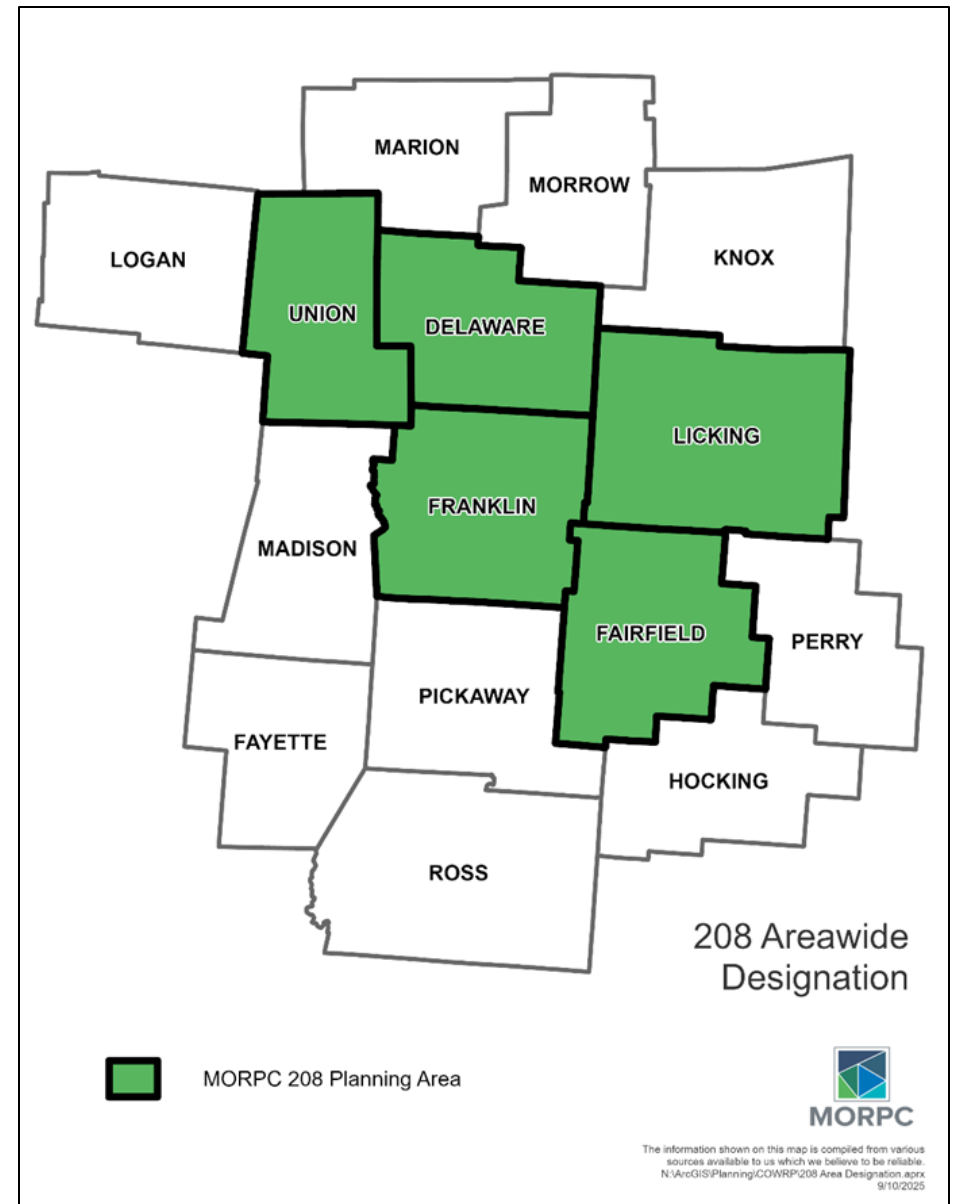
Ohio EPA 208 Plan: Big Darby Creek Water Quality Protections

- **Appendix 3-3**
- **Protection Prescriptions**
- **Protection Measures:
Stream Setbacks, Wetlands, and
Forested Areas**
- **Application: New Developments
within the Watershed**
- **Implementation:
Ohio EPA Permitting & Loans**



MORPC & 208 Planning

- **Request:**
Designation as an Areawide
- **Proposed Region:**
5 Central Ohio Counties
- **Steps:**
 - Governor Designates as an Areawide
 - U.S. EPA Approval
 - Certified MORPC 208 Plan
 - State 208 Plan Update for MORPC's 5 Counties
 - All steps pursued concurrently
- **Estimated Timeline: Up to 2 years**



Thank You

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