

Understanding 208 Plans: Their Role in Wastewater Planning and Projects

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208 PLAN BACKGROUND



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208 Plan: Background

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

Water Quality Management Plan – Sec. 208 and 303

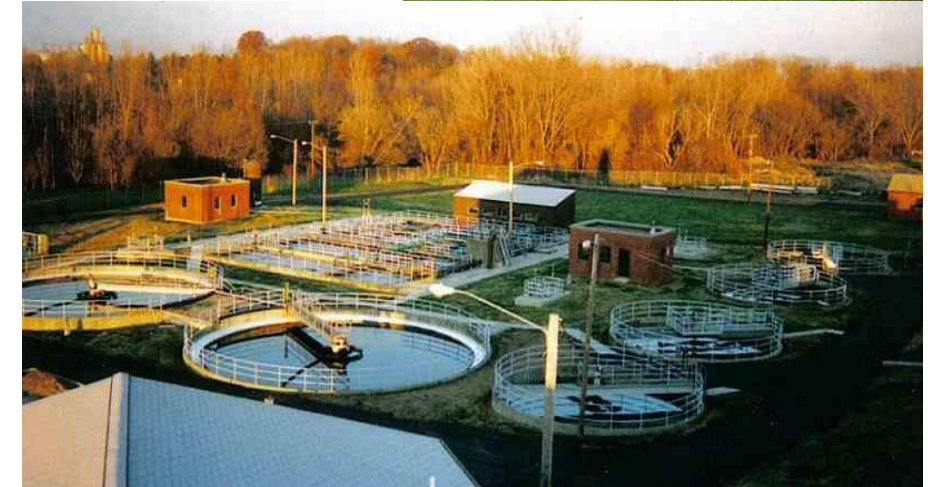
Section 208 = Areawide Waste Treatment Management

“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**



208 PLANS: AGENCIES, COMPARISON OF PLANS, BENEFITS, AND IMPLEMENTATION



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

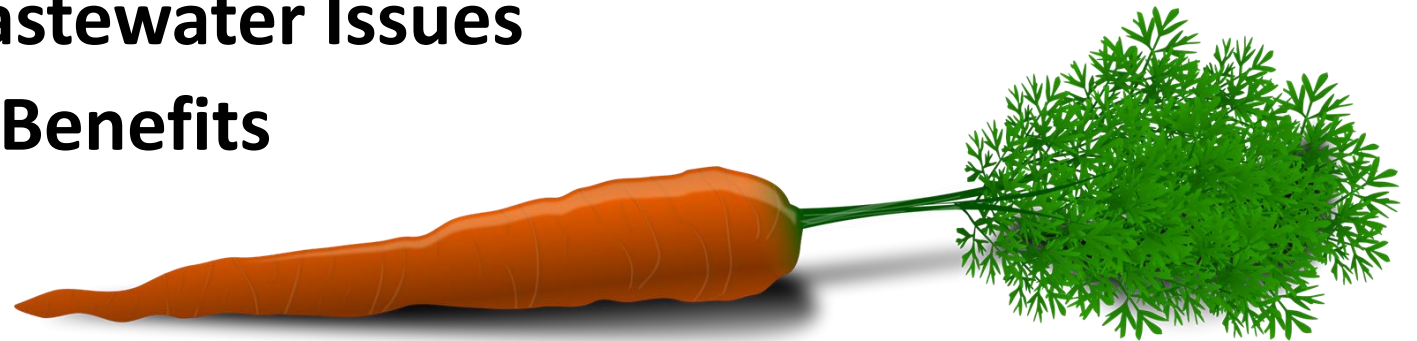
208 Plan Component	Ohio EPA 208 Plan	Areawide 208 Plans
Number of Counties	64	24
Dedicated Staff	1+	6+
Governor Certification and U.S. EPA Approval	Yes	Yes
Approval of Wastewater Changes for Existing FPAs	Ohio EPA Director	Governing Board
Existing Regional/County Water Quality Conditions	Yes (but dated)	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: Benefits

- **Locally Driven!!**
- **Proactive Planning**
- **Collaborative and Comprehensive**
- **Efficiencies of Regional Wastewater Treatment**
- **Support and Enhance Existing Planning Documents**
- **Reduces Unexpected Wastewater Issues**
- **Economic Development Benefits**
- **Living Document**



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**



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

epa.ohio.gov/divisions-and-offices/surface-water/reports-data/water-quality-management-plans-cwa-sections-208-and-303-

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Ohio EPA / Divisions & Offices / Surface Water / Reports & Data / Water Quality Management Plans (CWA Sections 208 and 303)

Welcome

Water Quality Management Plans (CWA Sections 208 and 303)

Water Quality Management (208) plans describe and promote efficient and comprehensive programs for controlling water pollution from point and nonpoint sources in a defined geographic area. Ohio EPA reviews and updates, as necessary, the state's 208 Plan.

Areawide Councils of Governments act as the lead planning agencies in 24 Ohio counties (those with large urban populations). These Areawide Agencies prepare and approve the 208 Plan in their counties. The State of Ohio prepares and maintains the 208 Plan applicable in the remaining 64 counties. The Governor then certifies the entire 208 Plan via submission to U.S. EPA for their approval.

[Expand All Sections](#)

Background

The What is a Water Quality Management Plan? has been recently updated.

What is a Water Quality Management Plan?

Ohio EPA oversees the State Water Quality Management (WQM) Plan. The State WQM Plan is a requirement of Section 303 of the Clean Water Act and must include nine (9) discrete elements:

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For more information
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epa.ohio.gov/monitor-pollution/maps-and-advisories/201-208-facility-planning-application

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Ohio EPA / Monitor Pollution / Maps & Advisories / 201/208 Facility Planning Application

Welcome

201/208 Facility Planning Application

This map is a collaborative effort between Ohio's Water Quality Management Planning (WQMP) Agencies and the Ohio EPA to provide guidance to those having the authority to develop and implement wastewater treatment projects within Ohio's communities.

[Launch](#)
201/208 Facility Planning Application

Maps & Advisories

Description

Under the federal Clean Water Act and Ohio Revised Code, Ohio EPA cannot issue a Permit-to-Install (PTI), National Pollutant Discharge Elimination System (NPDES) permit, or Water Pollution Control Loan Fund (WPCLF) monies for wastewater projects in conflict with a Water Quality Management Plan (208 Plan). This map is a collaborative effort between Ohio's Water Quality Management Planning (WQMP) Agencies and the Ohio EPA to provide guidance to those having the authority to develop and implement wastewater treatment projects within Ohio's communities. This map is to be consulted to determine 208 Plan compliance on Ohio EPA's Permit-to-Install/Plan Approval Application (Form A, Question #12) or other applicable Ohio EPA wastewater applications. Map users are encouraged to reach out to respective WQMP agencies for additional site specific information or questions.

Access and Use Constraints

This map is to be consulted to determine 208 Plan compliance on Ohio EPA's Permit-to-Install/Plan Approval Application (Form A, Question #12) or other applicable Ohio EPA wastewater applications. Map users are encouraged to reach out to respective WQMP agencies for additional site specific information or questions.

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208 PLANS KEY COMPONENTS FOR WASTEWATER PROJECTS



208 Plans: Key Wastewater Components

Management Agencies

Facility Planning Areas (FPAs)

Prescriptions for Wastewater Treatment (Prescriptions)

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



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208 Plan Key Component: Management Agencies (MAs)

- **Responsible for Wastewater Planning and Implementation**
- **CWA Requirements**
 - Legal Authority
 - Managerial Capacity
 - Financial Resources
- **A.K.A.**
 - Designated MAs or DMAs
 - Satellite Agencies/Communities
- **Eligible MAs in Ohio**
 - Cities and Village (Home Rule Powers)
 - County Commissioners (ORC 6117)
 - Sewer Districts (ORC 6119)
 - Limited Home Rule Townships (ORC 504)
 - Private Utilities Regulated by PUCO





208 Plan Key Component: Facility Planning Areas (FPAs)

- **Defined Region**
- **Typically Associated With:**
 - **Publicly Owned Treatment Works (POTWs)**
 - **County/Regional Sewer District**
- **Analysis of Options – 20 Years**
 - **Sanitary Sewers**
 - **Onsite Treatment Systems**
 - **Package Plants**
- **Not Services Areas!!**
- **Can Have Multiple MAs**
 - **Owner/Operator of POTW**
 - Lead Entity
 - Primary MA/DMA
 - Wastewater Treatment MA
 - **Wastewater Collection**
 - Secondary MA/DMA
 - Satellite MA/DMA
 - Wastewater Collection MA
 - **Regional Planning MAs**
 - Primary MA/DMA
 - Regional Wastewater Planning (RWP)



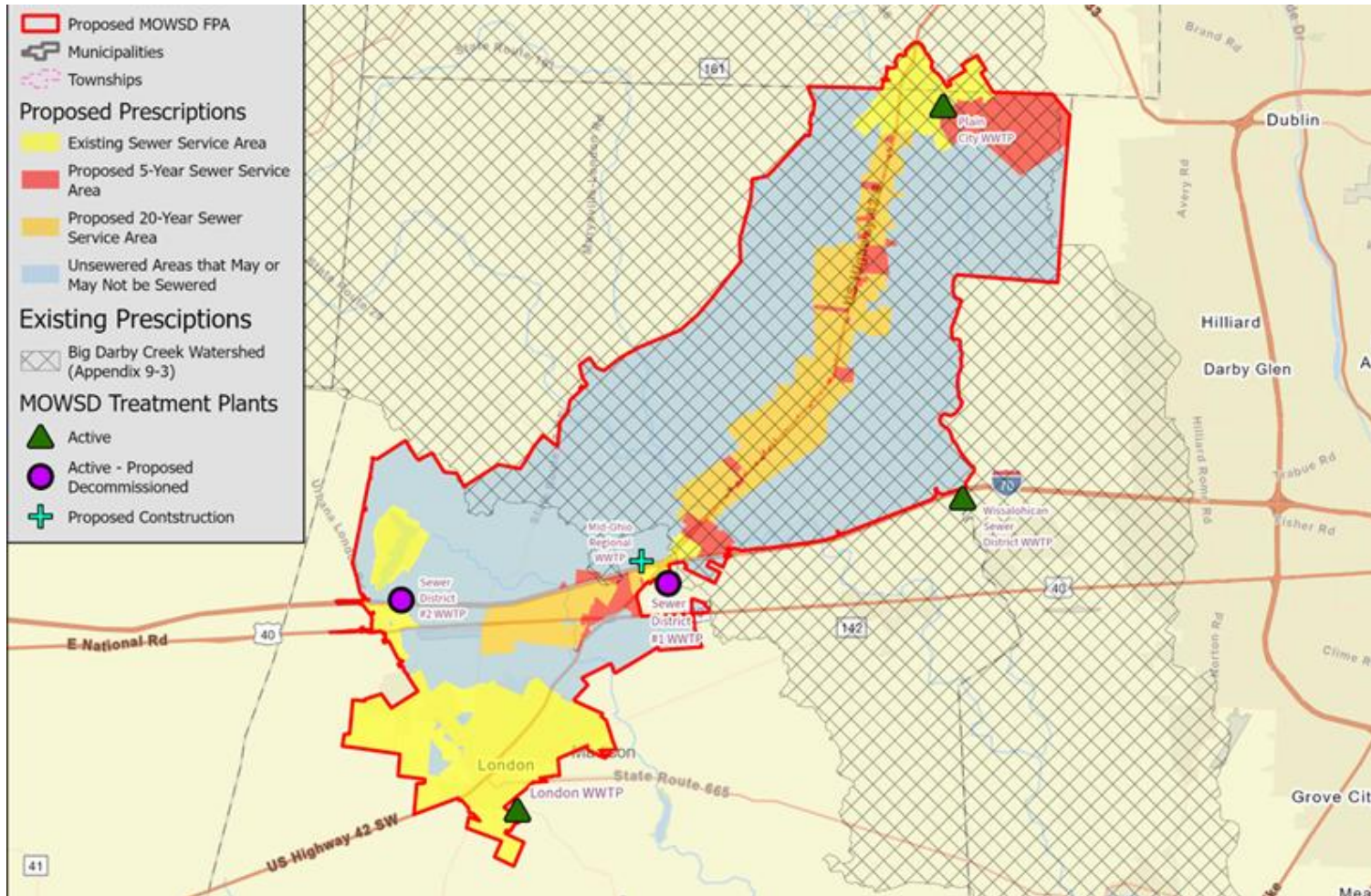
208 Plan Key Component: Prescriptions for Wastewater Treatment

- **The “Ws”**
 - Where, when, what, and who
- **Wastewater Management Options:**
 - Highly variable throughout the State
- **20-Year Timeframe**
- **Up-To-Date Planning**
- **Can Reflect Sewer Agreements**
- **Locally Agreed Upon Specific Prescriptions**
- **Typical Prescriptions:**
 - Areas currently sewerred
 - Areas planned for sewers
 - Areas served by onsite systems
 - Areas served by communal systems
 - Areas served by either...or...
 - Unique prescriptions for limited area



Key Components Example

Mid-Ohio Water & Sewer District Facilities Plan



- **New ORC 6119 District**
- **Consolidation Agreement**
 - London, Plain City, and Madison County
- **Planned Regional WWTP**
- **Sewer Service Plans**
 - Five-year and 20-year proposed sewer service areas
 - Areas not planned for sewers



STATE AND OHIO EPA 208 PLAN



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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

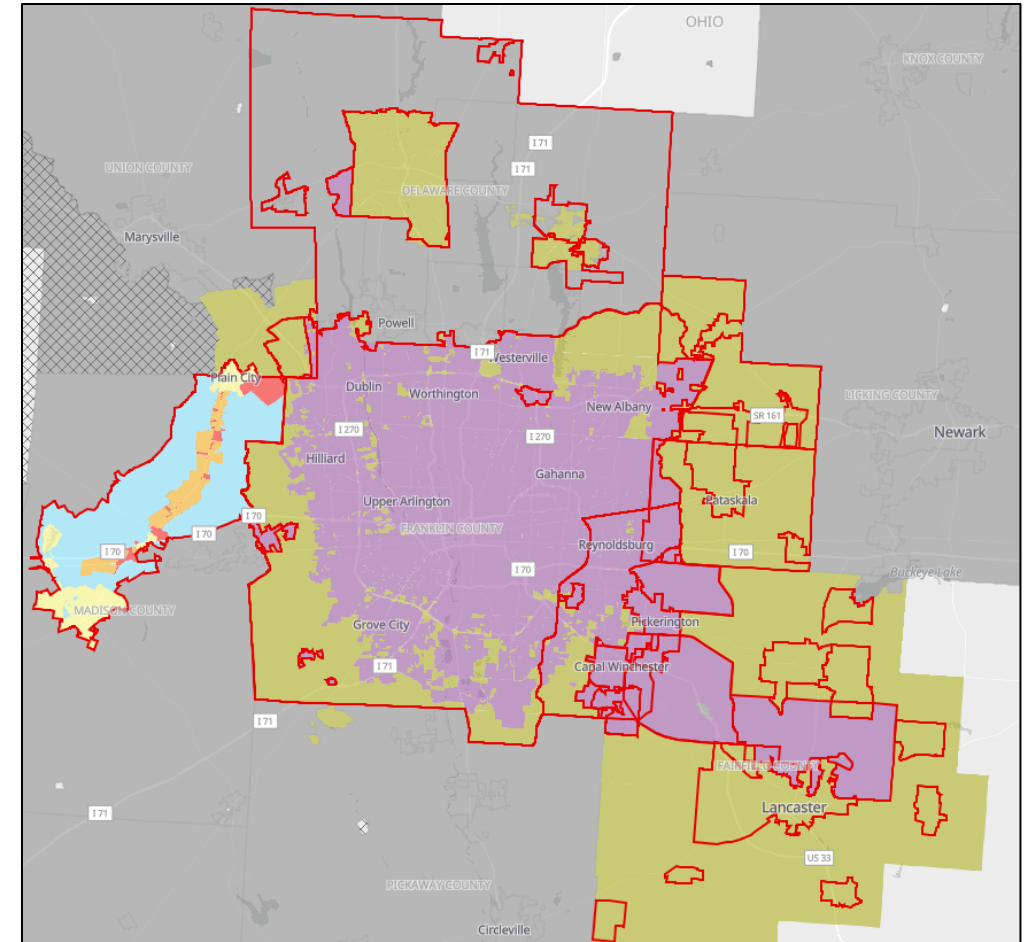
Planning Step	Materials Submitted in the Facility Plan to Ohio EPA
1. Delineate Current Service Area	Provide up-to-date maps of the current sewer service area with all trunk lines and pump stations shown. If possible, these maps should be in a standard GIS format, or a CAD format transferable to GIS 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 sewered 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 sewered 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



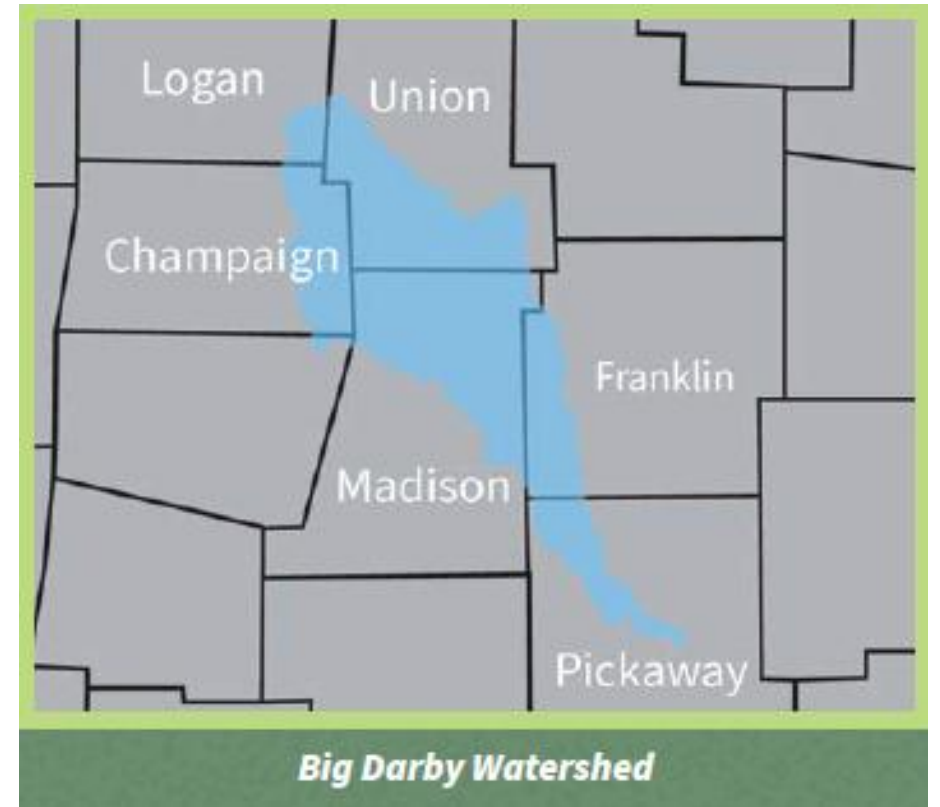
Ohio EPA 208 Plan: Generic Prescriptions (GPs)

- **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**



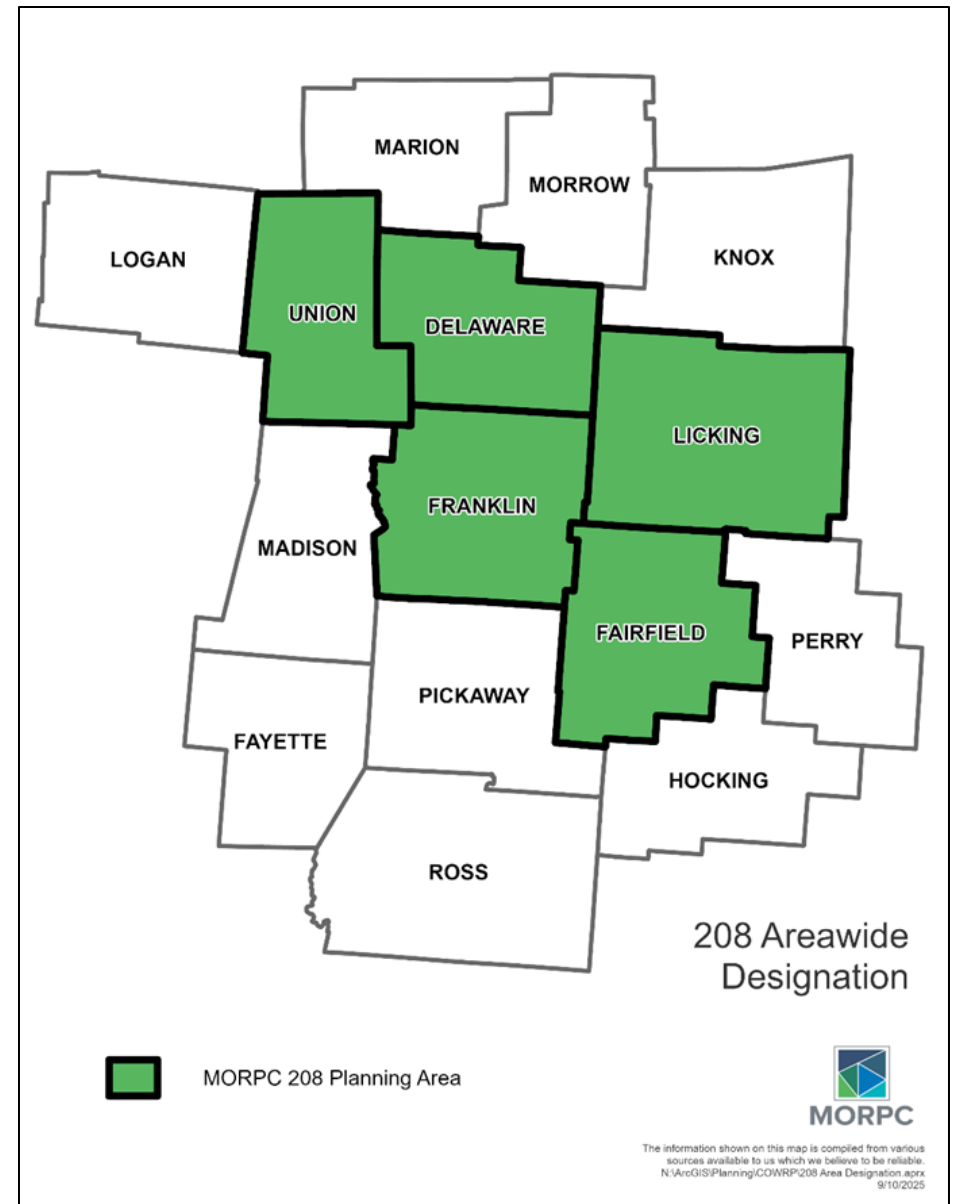
Ohio EPA 208 Plan: Big Darby Creek Water Quality Protections

- **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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