

**TITLE 252. DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHAPTER 690. WATER QUALITY STANDARDS IMPLEMENTATION**

**SUMMARY OF COMMENTS AND RESPONSES**

**COMMENT PERIOD:** December 1 through December 31, 2012

- 1. COMMENT:** AEP/PSO (OAC 252:690-3-32) – Any WET retesting that falls in the following test period should count as the WET test for that test period also.

**RESPONSE:** A WET test failure indicates increased toxicity in the effluent. Therefore, more frequent samples are necessary to identify the source of toxicity. Substituting a quarterly test with a retest minimizes the opportunity to identify the source of toxicity. This is why the permit encourages facilities to complete WET testing early in the quarter, so if a WET test is failed, the retests would not occur in the next quarter.

- 2. COMMENT:** AEP/PSO (OAC 252:690-3-91) – The existing language should be retained.

**RESPONSE:** A facility should not be given a monitoring frequency reduction when there are any violations of a permit limit. Additionally, if a facility is given a monitoring frequency reduction after a violation has occurred, there will be less chance that any additional violations will be detected. Also, the sample may be less representative of the effluent if the monitoring frequency is reduced.