

# Ohio EPA Distribution Updates

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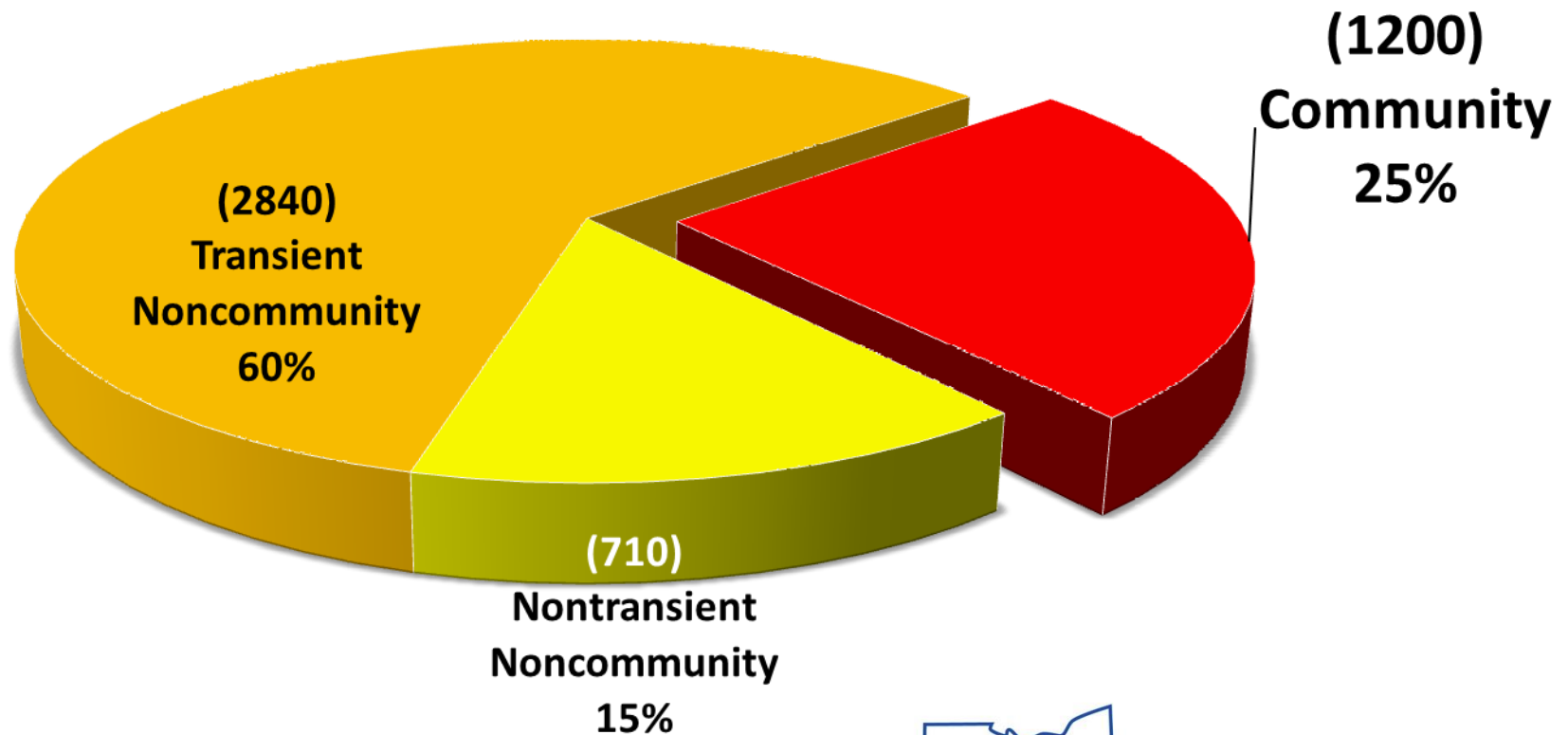
# Overview

- RTCR Basics
- Save a Dime
- Lab Oversight Updates
- Lead Free Updates
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- Electronic Reporting
- Service Disruptions
- Backflow Updates

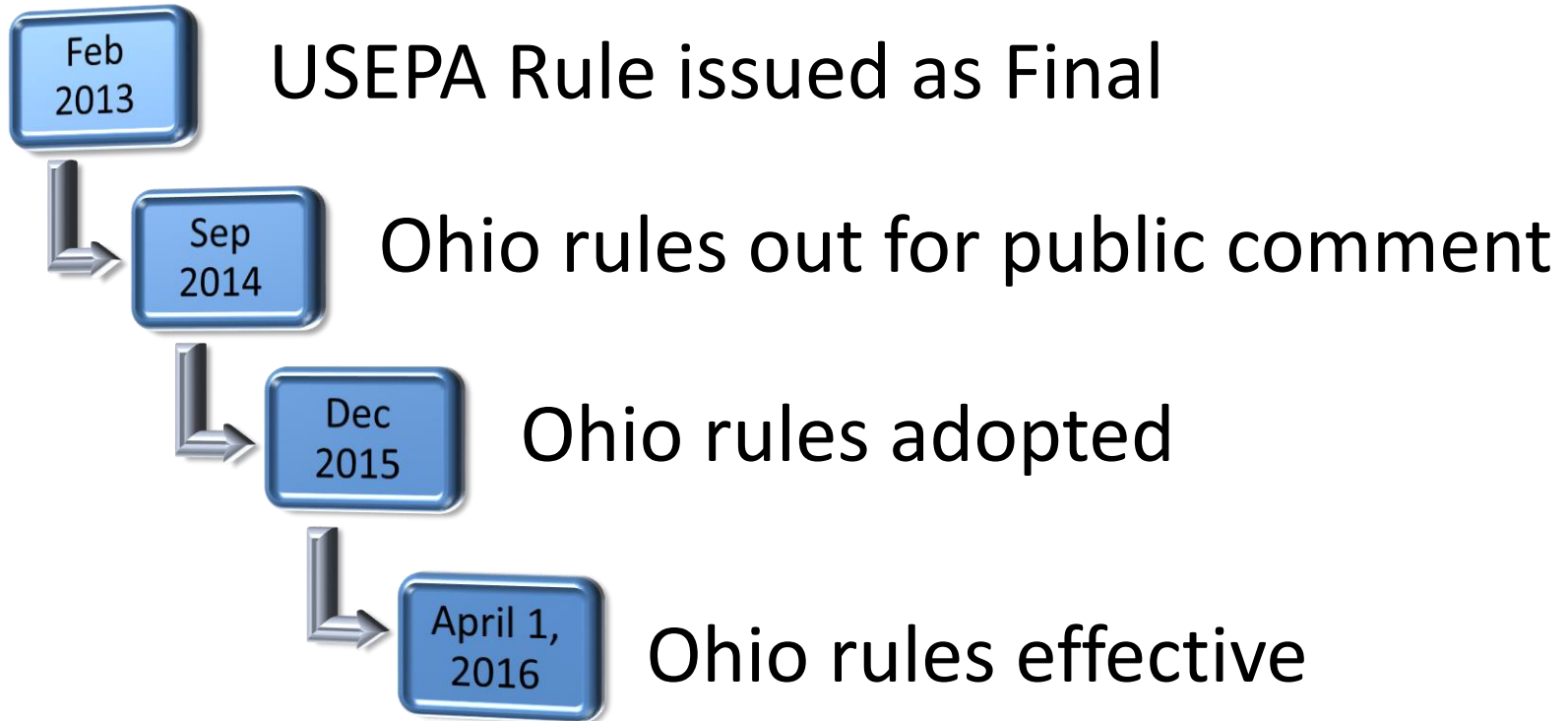


# Public Water Systems in Ohio

**4750 Systems Total**



# RTCR Background



# Big Picture

- Applies to ALL public water systems (PWS)
- MCL for total coliform eliminated
- New MCL for *E. coli*
- Treatment Technique - Level 1 or Level 2 Assessments



# Big Picture (continued)

- Small Noncommunity GW Systems
- Seasonal Systems – must follow state-approved start-up procedure and document it. State may require sample.
- Monitoring and reporting violations are separated



# RTCR Basics

1. Sample Siting Plan
2. Monitoring
3. Violations



# RTCR Basics - Sample Siting Plans

- Must specify locations and numbers for routine and repeat locations
- May identify dedicated repeat sampling stations or locations according to SOP
- SSP must be updated to meet RTCR by 3/31/16





# RTCR Basics - Routine Monitoring

- Large Community PWS
  - Routine monitoring is unchanged
- Small Community PWS (pop <1001)
  - One sample per month
  - Ohio EPA does not plan to adopt Fed provision for quarterly sampling



# RTCR Basics - Routine Monitoring

## Small Noncommunity PWS (pop <1001)

- Affected most by new rule
- Baseline will remain 1 sample per quarter
- Ohio EPA does not plan to adopt reduced annual monitoring
- Temporary increase in month following TC+: **3 instead of 5**
- Triggered monthly monitoring
  - ✓ 2 or more TC monitoring violations w/in past 12 months
  - ✓ Combination of one Level 1 Assess. and one TC mon. viol.
  - ✓ Level 2 Assessment
  - ✓ Treatment technique violation



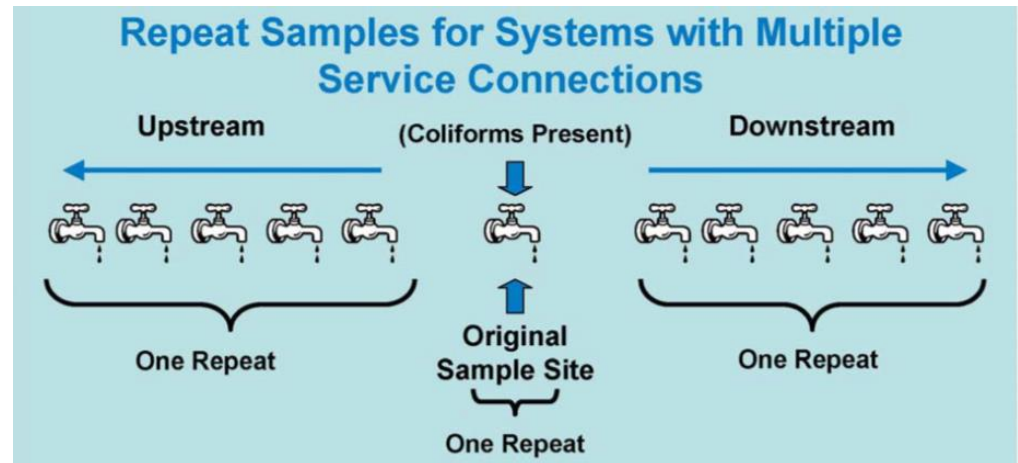
# RTCR Basics - Routine Monitoring

- Seasonal Systems –  
By definition a PWS that serves water a portion of the year and shuts-down
- Start-up procedure and report
- TC sample 1x/month during season will be proposed as baseline



# RTCR Basics - Repeat Monitoring

- **3 instead of 4**
- Additional sets of repeats
- *E. coli* is sole fecal indicator
- Failure to take all is not a monitoring violation
- Consecutive GW Systems must notify supplier



# RTCR Basics - Violations

- *E. coli* MCL violation

ROUTINE	REPEAT
EC+	TC+
EC+	Any missing sample
TC+	EC+
TC+	TC+ - <u>but no E. coli analysis</u>



- Treatment technique violations
- Monitoring violations
- Reporting violations

# RTCR Basics - Violations

- Monitoring violations - only 2
  - Failure to take routine total coliform sample
  - Failure to analyze for E. coli following a TC+ routine sample
- Reporting violations - new ones
  - Failing to submit an Assessment form on time
  - Failure by a seasonal PWS to submit documentation that required start-up procedure was completed



# Save a Dime, Sample on Time!

## It's not an option, it's your responsibility!

- New Ohio EPA program to provide a deterrent to violations and increase public health protection.
- More expensive to fail to sample than it is to sample.
- Beginning January 1, 2014, there will be a penalty of \$150 or more for each monitoring violations.
- Don't put your consumers at risk, sample on time!



# Lab Oversight Update

- Assessing reporting compliance for laboratories
- May 28, 2013 informational letter to laboratories
- Will begin issuing routine Notices of Violation to laboratories for reporting violations
- May result in further enforcement





# Lead Free Update

- Subject: Summary of the Reduction of Lead in Drinking Water Act and Frequently Asked Questions
- EPA has posted on its Web site a revised list of frequently-asked-questions to assist manufactures, retailers, regulators and the general public in complying with and understanding the requirements of the Reduction of Lead in Drinking Water Act. The FAQs address the definition of lead free, the effective date, calculating lead content, 3rd party certification, product labeling, repair and replacement parts, and exemptions. The FAQs can be found at: <http://water.epa.gov/drink/info/lead/upload/epa815s13001.pdf>
- The Reduction of Lead in Drinking Water Act was enacted on January 4, 2011, to amend Section 1417 of the Safe Drinking Water Act, which covers the use and introduction into commerce of lead pipes, plumbing fittings or fixtures, solder and flux. The Reduction of Lead in Drinking Water Act changes the Safe Drinking Water Act definition of “lead free” and creates exemptions from the Lead Free requirements for plumbing products that are not used for drinking water. The Reduction of Lead in Drinking Water Act established a prospective effective date of January 4, 2014.
- The FAQs were developed based on interaction with stakeholders.



# Lead Free Update

- USEPA published FAQ
- Hydrants are required to be lead free
- Repairs clarified
- Still problematic
- Pb/Cu Long Term Revisions
  - NDWAC advising USEPA



# Legionella Treatment

- Increasing Outbreaks
- Hospitals seeking additional treatment
- Makes them a pws
- Treatments
  - Copper Silver
  - Chlorine Dioxide
- Operational/Distribution Requirements
- Statewide group forming



# Electronic Reporting

Requirement to submit monthly operational report (MOR) to Ohio EPA using eDWR by the following dates:

Population Served	Latest Date to Begin
3,301 or more	July 1, 2012
501 - 3,300	July 1, 2013
500 or fewer	July 1, 2014

Contact Brian Tarver with questions (614) 644-2752



# Service Disruptions

- The owner or operator shall report to the appropriate Ohio environmental protection agency district office as soon as possible, but within twenty-four hours, the discovery of any serious plant or distribution system breakdown or condition causing or likely to cause:
  - (a) Any discharge of water not in accordance with section 6109. of the Revised Code or the rules adopted thereunder;
  - (b) Any major interruption in service or disinfection; or
  - (c) Any hazard for employees, consumers, the public or the environment.



# Returning tanks to service

- Finished water storage facilities serving noncommunity water systems serving a population of at least one thousand people and all community water systems, prior to being placed into service or being returned to service after repairs, inspections, painting, cleaning, or other activities that might lead to contamination, shall:
  - (a) Meet the requirements of "American Water Works Association Standard C652-02 Disinfection of Water-Storage Facilities" (2002); and
  - (b) Be monitored for chlorine residual and comply with the minimum chlorine residual established in paragraph (C)(1) of this rule and the MRDL established in paragraph (C) of rule 3745-81-10 of the Administrative Code.



# Returning waterlines to service

- (c) Water mains serving noncommunity water systems serving a population of at least one thousand people and all community water systems, prior to being placed into service or being returned to service after repairs, inspections, or other activities that might lead to contamination, unless a minimum pressure of twenty pounds per square inch gauge at ground level is maintained at all points in the distribution system, shall:
  - (1) Meet the requirements of "American Water Works Association Standard C651-05 Disinfecting Water Mains" (2005); and
  - (2) Be monitored for chlorine residual and comply with the minimum chlorine residual established in paragraph (C)(1) of this rule and the MRDL established in paragraph (C) of rule 3745-81-10 of the Administrative Code.



# Backflow Rules

- Working on addressing Commerce's recent comments on the Manual
- Unresolved items
  - Re-survey Requirements
  - Jurisdictional discussions with Commerce
- Sub-group for unresolved items
  - Ohio EPA
  - PWS – ORWA and OAWWA
  - Commerce



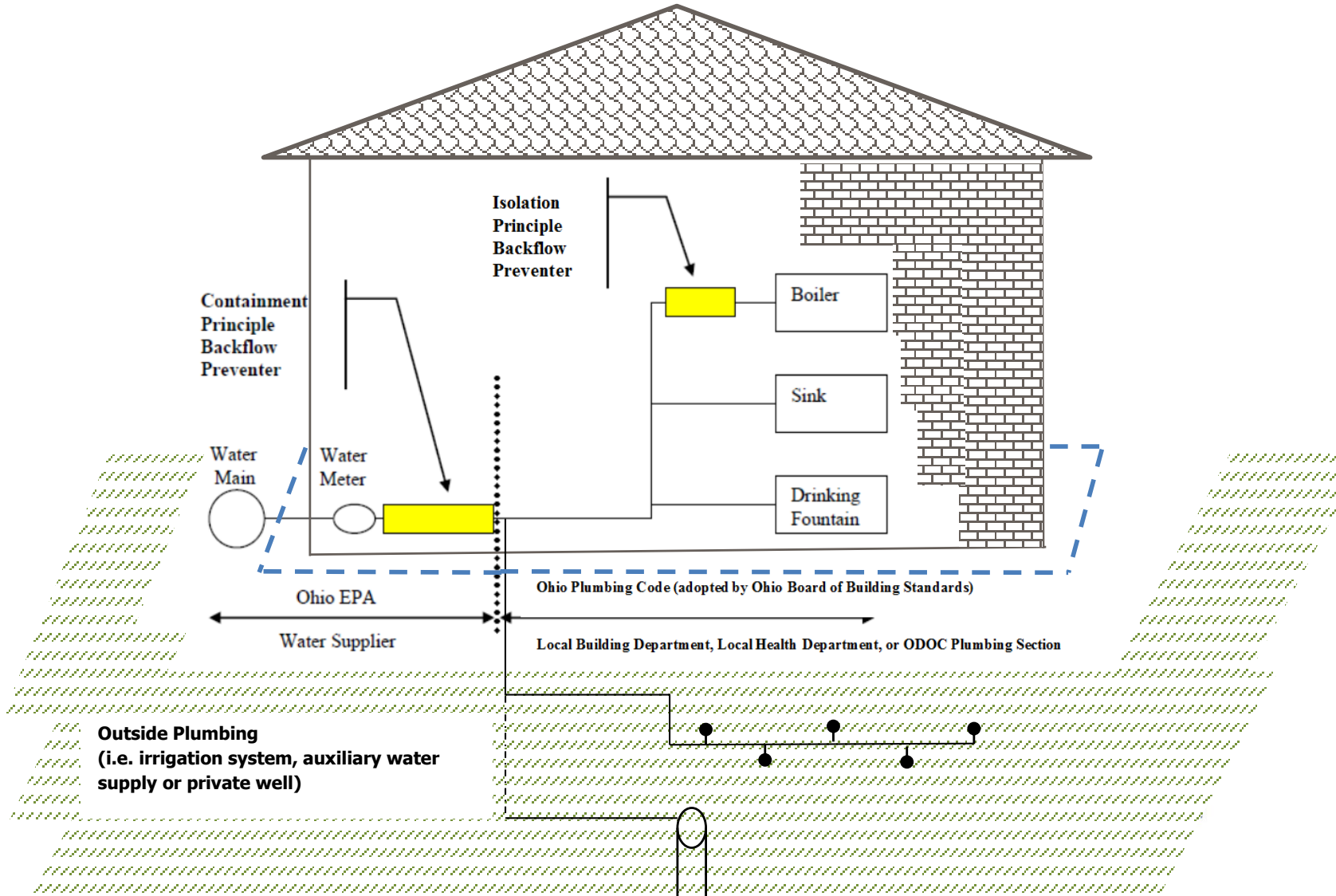


# Surveys and Investigations

- **3745-95-03. Surveys and investigations.**
- The supplier of water shall conduct or cause to be conducted periodic surveys and investigations, every five years or more frequently, of water use practices within a consumer's premises to determine whether there are actual or potential cross-connections to the consumer's water system through which contaminants or pollutants could backflow into the public water system.
- To meet this requirement, the supplier of water must develop and implement a process to identify changes in water use practices at the consumer's premises so that new and/or increased hazards to the public water supply are addressed and mitigated. Triggers such as a request for a new or additional service line, an additional or larger meter, or a change of occupancy, should be considered, on an ongoing basis. Provisions must demonstrate a good faith effort by the supplier of water to review determinations for backflow prevention at the service connection and be documented in the supplier of water's program.



# Backflow Jurisdiction



# Questions?

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