

2024 UPDATE DRINKING AND GROUND WATERS

Amy Klei, Chief

OTCO 2024 Compliance Workshop



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DDAGW Overview

PFAS

Lead and Copper

Cybersecurity

Rule Updates

Grant Opportunities

Ohio PFAS Action Plan 2.0 PFAS.ohio.gov



Stay Compliant

Make a Difference

Monitor Pollution

Get Funding

Find Regulations

Current Ohio PFAS Action Plan 2.0 Efforts

Plan Overview



Mitigation



Sampling



Source Investigations



Standards and Advisories



PFAS Treatment Guidance



Funding and Settlements



Ohio Existing and Upcoming Funding Opportunities for Communities



Education and Guidance

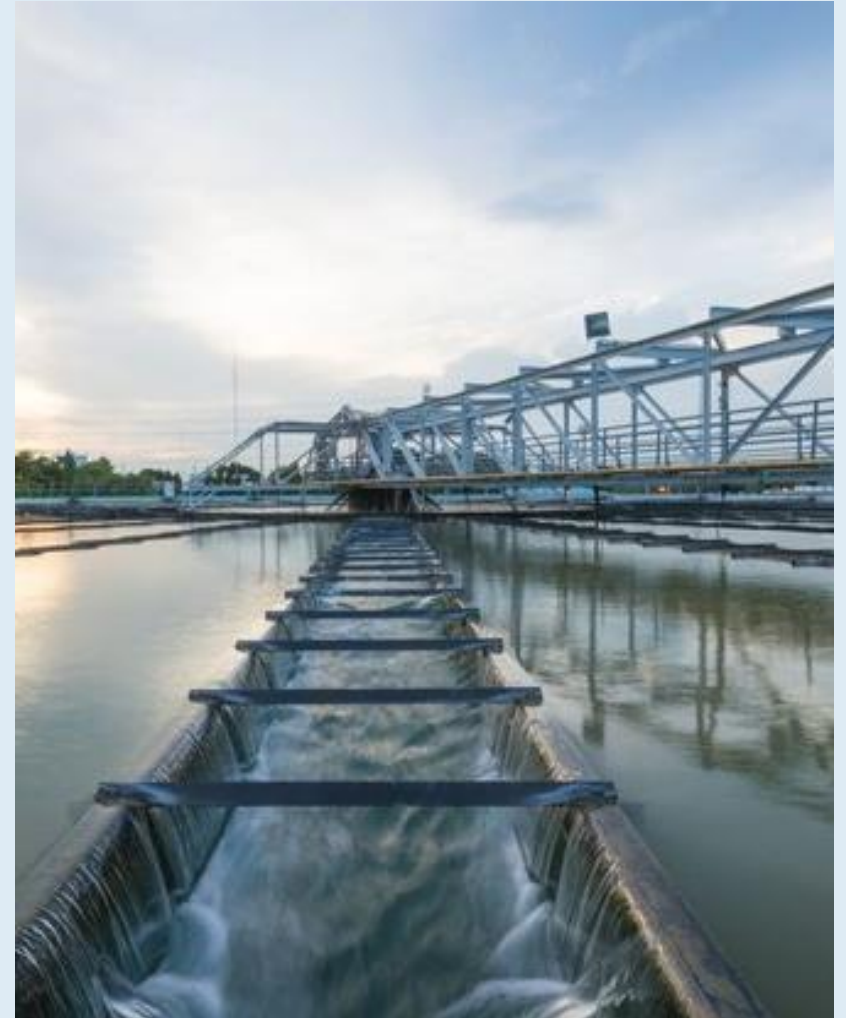


Data Tracking and Mapping



PFAS MCL Rule Development

- April 10, 2024: Final National Primary Drinking Water Regulation (NPDWR) for PFAS Chemicals under the Safe Drinking Water Act (SDWA) announced by U.S. EPA
 - Establishes legally enforceable levels MCLs
 - Effective June 25, 2024
- Public Water System requirements:
 - By 2027, monitor for the six PFAS and notify the public of the levels
 - By 2029, implement solutions to reduce levels and meet the new standards
- Ohio EPA has initiated rule development
 - Early Stakeholder Outreach on proposed rulemaking governing PFAS started August 20, 2024
 - Comments due September 20, 2024
 - Discussions ongoing with OAWWA



Ohio PFAS Treatment Guidance

Addresses considerations for the following treatment options:

- Point of use (POU)/point of entry (POE)
- Centralized treatment
 - High pressure membrane filtration (HPMF)
 - Granular activated carbon (GAC)
 - Anion exchange (AX)

August 2024 – pfas.ohio.gov



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Division of Drinking and Ground Waters
August 2024

PFAS Treatment Guidance

I. PURPOSE

The purpose of this document is to establish a recommended standard protocol for obtaining approval of PFAS mitigation strategies while simultaneously ensuring compliance with all applicable drinking water regulations. The primary goal is to assist Public Water Systems with PFAS MCL compliance, particularly for systems installing new PFAS treatment; systems with existing PFAS treatment (whether PFAS treatment was the original treatment objective or otherwise) will be evaluated on a case-by-case basis. For specific information on the PFAS regulation, including MCLs, refer to the U.S. EPA's website.

It is intended that the successful application of these guidelines will result in the design of a cost-effective treatment system that will provide drinking water that meets or exceeds the treatment requirements. This protocol addresses treatment options to include point of use (POU)/point of entry (POE), high pressure membrane filtration (HPMF), granular activated carbon (GAC), and anion exchange (AX). Each of these treatment options may address other water quality issues in addition to PFAS. In addition, each of these treatment options may have limitations based on site-specific water quality challenges and finished water quality goals, which need to be considered during the design process to ensure simultaneous compliance with other Primary and Secondary Drinking Water Regulations.

Any deviations from this protocol will require additional justification and approval from Ohio EPA. If deviations

Ohio PFAS Treatment Guidance

Water Quality Data Collection

Demonstration Study Requirements

Corrosion Control Treatment Evaluation

Waste Stream Evaluation

Detail Plan Review

Follow Up Monitoring and Reporting



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Demonstration Study Considerations

- Bench Scale vs Pilot Scale
- Rapid Small Scale Column Test can provide information on the best media but may not translate well to full scale on breakthrough
- Option to do either but results of bench scale could indicate a pilot scale is needed
- Breakthrough impacts cost so demonstration study is crucial for small systems
- USEPA conducting research and compiling experience

Waste Stream Considerations

- Need to have a location to discharge
- If backwashing, it has been found that backwash water doesn't contain much PFAS
- Solid waste – have a plan for disposal, ask the supplier
- Future regulations on waste and PFAS are unknown



PFAS Treatment

Key Challenges

- Bench scale vs pilot
- Underestimation of pilot time/cost
- Underestimation of long-term O/M
- Competing contaminants
- Wastestream management
- Resistance to treatment alternatives (incl. regionalization)
- Keeping guidance current



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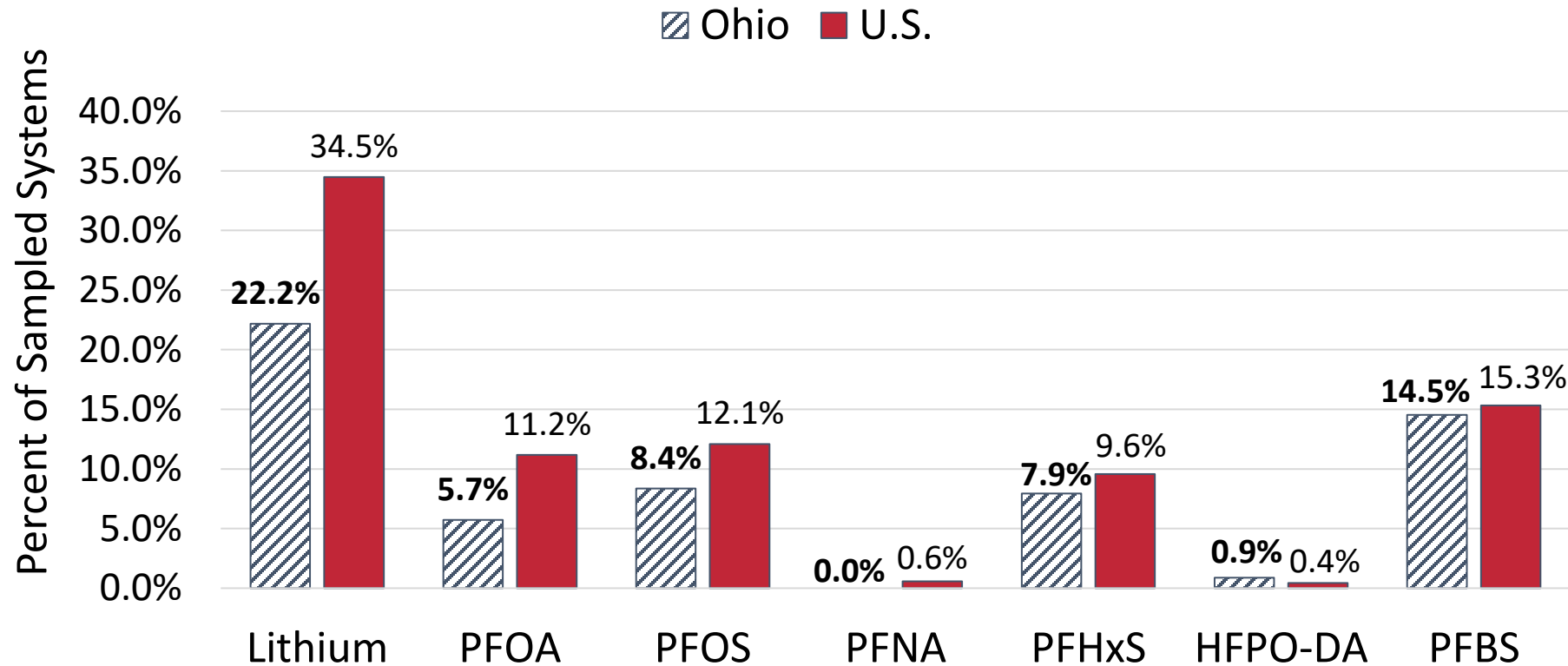
UCMR 5 Update

- **Goal:** collect occurrence data for unregulated contaminants that may require regulation
- Contaminants: Lithium & 29 PFAS
- Sampling occurs between 2023 and 2025
- PWS Participation:

PWS Count, National	PWS Count, Ohio
10,311	338

UCMR 5 Summary: By Detects

PWSs with Detections (> MRL)

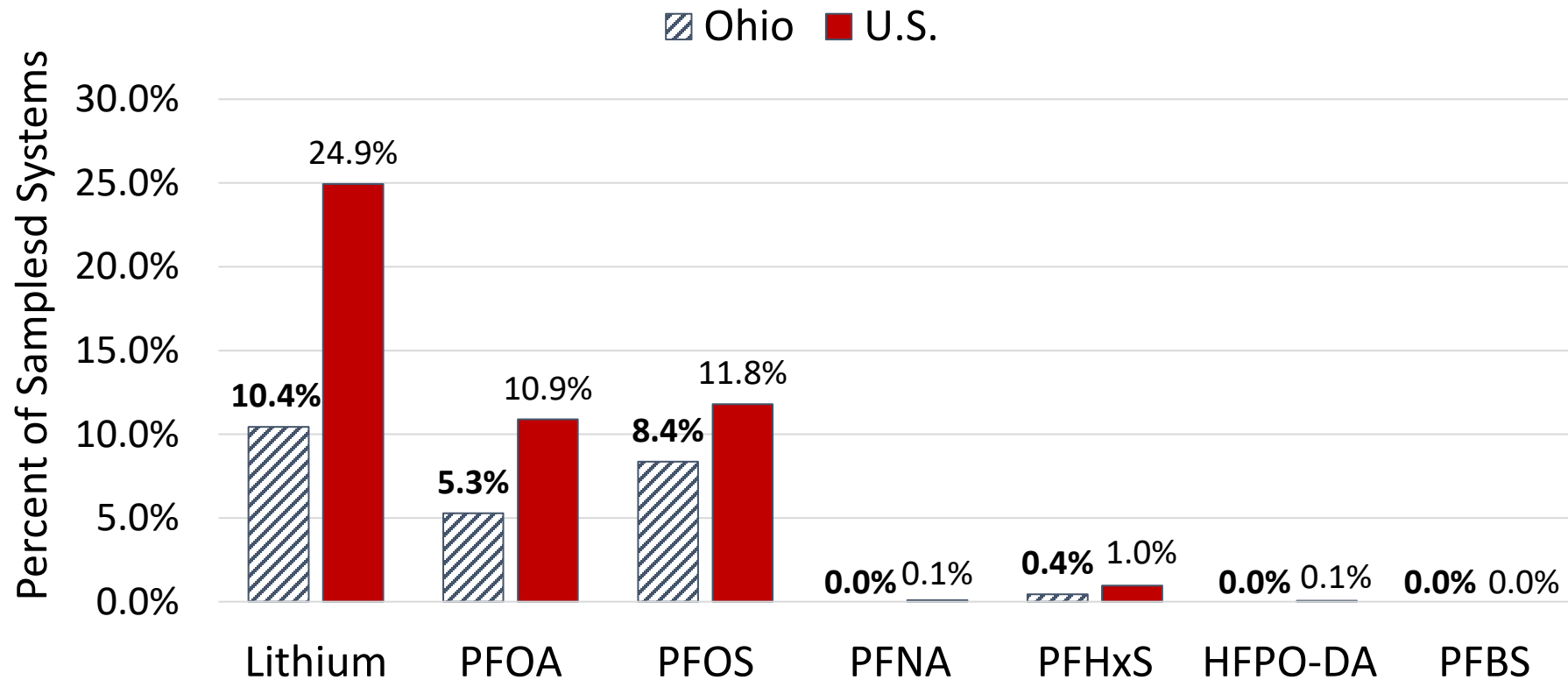


- Data ≤ July 11, 2024
- MRLs (ppt):
 - Li: 9,000
 - PFOA: 4
 - PFOS: 4
 - PFNA: 4
 - PFHxS: 3
 - HFPO-DA: 5
 - PFBS: 4

Represents ~51% of Ohio data and ~46% of U.S. data to be collected

UCMR 5 Summary: By Ref Vals

PWSs with Samples Above Reference Value



- Data: ≤ July 11, 2024
- Ref Vals (ppt):
 - Li = 10,000
 - PFOA: 4.0
 - PFOS: 4.0
 - PFNA: 10
 - PFHxS: 10
 - HFPO-DA: 10
 - PFBS: 2,000

*ref vals: Li = HRL, PFBS = HBWC
from HI, other PFAS = MCLs*

Lead and Copper

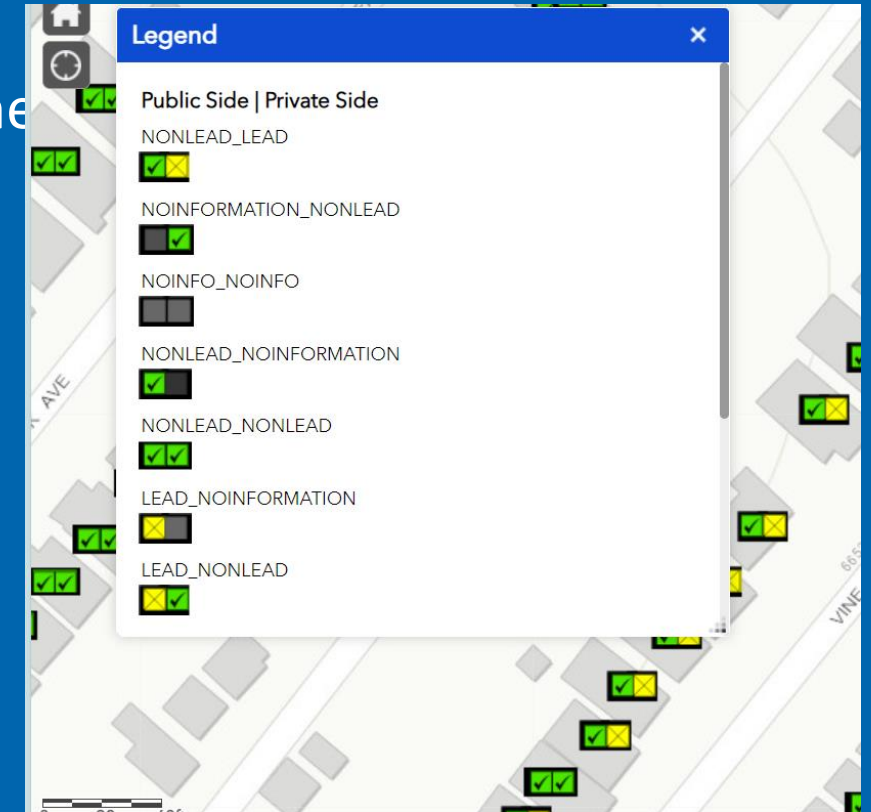
Current Requirements

- LCRR compliance date Oct. 16, 2024
 - Initial service line inventory – Oct 16
 - Service line material notifications – Nov 15
 - Tier 1 PN lead action level exceedance - Oct 16



Service Line Inventory

- All community and non-transient non-community
- Must include all service lines regardless of use or owner
 - Not connectors
- System owned and customer owned
- Four categories of service lines
 - Lead
 - Galvanized requiring replacement (GRR)
 - Non-lead
 - Lead status unknown (unknown)
- Must be on Ohio EPA template



Lead and Copper Rule Improvements (LCRI) Update!



News Releases: [Headquarters](#) | [Water \(OW\)](#)

[CONTACT US](#)

Biden-Harris Administration Issues Final Rule Requiring Replacement of Lead Pipes Within 10 Years, Announces Funding to Provide Clean Water to Schools and Homes

EPA announces new final regulations and \$2.6 Billion under the Biden-Harris Administration's Investing in America agenda for clean drinking water

October 8, 2024

Contact Information

EPA Press Office (press@epa.gov)

WASHINGTON – Today, October 8, the Biden-Harris Administration issued a final rule requiring drinking water systems across the country to identify and replace lead pipes within 10 years. The Lead and Copper Rule Improvements (LCRI) also require more rigorous

- ***Final rule issued yesterday October 9, 2024***

<https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements>

Final LCRI

Compliance date 2027

- Requirement to replace all LSLs by 2037 (w/in 10 yrs of 2027 compliance date)
- Requires LSL Replacement Plan in 2027
- Identify all unknowns by 2037
- Baseline inventory due 2027
- Lowers action level from 15 ppb to 10 ppb
- Strengthens tap sampling requirements , including 1st and 5th liter sample collection
- Expands school and childcare requirements, including sampling at all facilities 2027-2032

Lead Strategy Project Update

1. Facilitate Stakeholder Outreach Sessions, Summarize, and Evaluate Input
2. Evaluate Ohio EPA's Lead and Copper Rule Program
3. Develop Draft Strategy
4. Develop Local Engagement Toolkit for PWS and Communities to Promote and Facilitate Removal of Lead Service Lines
5. Recommend Statewide Education and Outreach Campaign



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Cybersecurity Update

- Threats and increased awareness
- Ohio provided response to federal request for water sector Cybersecurity Plan
 - Based on 2022 Ohio Comprehensive Cybersecurity Plan
- Thank you to those that completed Ohio EPA's cyber security survey



This photo provided by the Municipal Water Authority of Aliquippa shows the screen of a Unitronics device that was hacked in Aliquippa, Pa., on Nov. 25.
Municipal Water Authority of Aliquippa via AP

Cybersecurity Current Objectives

- **Understand the universe** and provide outreach to have 100% of utilities complete vulnerability assessments
- **Connect utilities to resources and funding** to address any vulnerability gaps (maintain cyber webpage, expand partnerships, potentially create new funding programs)
- **Encourage systems to incorporate cyber incidents** into contingency plans
 - Practice and exercise the ability to run system on emergency power, and ability to run facility manually
- **Leverage programs and requirements** to ensure enhanced cybersecurity at Ohio water utilities
 - Prioritize funding
 - Asset management program requirements to ensure network resilience

Ohio EPA

Rule Making Process



1. Early Stakeholder Outreach (ESO)
 - Identify ideas/discuss intent



2. Interested Party Review (IPR)
 - Share draft rules for review



3. Original File
 - File proposed rules




4. Final File
 - File final rules

Rule Updates Online

https://epa.ohio.gov/divisions-and-offices

An official State of Ohio site. [Here's how](#)



Ohio EPA / Divisions & Offices / Drinking Water

Regulations

- Welcome
- Early Stakeholder Outreach
- Interested Party Review
- Proposed Rules
- Effective Rules
- Additional Information

Announcements

[Expand All Sections](#)

September 11, 2024: Proposed "Amend" and "No Change" to Underground Injection Control Rule in Chapter 3745-34

The Division of Drinking and Ground Waters (DDAGW) has proposed "Amend" and "No Change" to Underground Injection Control Rule in chapter 3745-34 of the Ohio Administrative Code (OAC) to Joint Committee on Agency Rule Review (JCARR). See the [Proposed Rules](#) page for more information.

August 14, 2024: Proposed "Amend" to Operator Certification Rule - (OAC) Chapter 3745-7

May 10, 2024: Water Quality Parameters Reporting Tool in eDrinking Water Reports (eDWR)


April 10, 2024: U.S. EPA Final PFAS National Primary Drinking Water Regulation

Now Available! Lead Service Inventory and Replacement Planning Request for Proposal Advertisement

Rule Announcements


Find Regulations ? Help Search

Language Translation



Check out the latest announcements


See what's new, including rule postings and comment period notifications.



Check out the latest announcements

See what's new, including rule postings and comment period notifications.

[Go Now](#)



ESO - Early Stakeholder Outreach

- **Lab Certification (OAC 3745-89-02, -10, -11)**
 - Completed, preparing IPR
- **Source Monitoring (OAC 3745-81-65,-66,-71)**
 - Completed, preparing IPR
- **Plan Approval (OAC 3745-91-02)**
 - Completed, preparing for IPR
 - Proposing alternative plan review process for expedited review of waterline extension detail plans that meet certain criteria



IPR – Interested Party Review

- **Asset Management (OAC 3745-87-01, -02, -03, -04, -05)**
 - IPR ended, preparing to original file rules
 - Updating and adding definitions
 - Adding language specifying that only community and non-transient non-community PWSs are required to develop an asset management plan
 - Increasing the mileage of distribution pipe breaks that need to be recorded
 - Adding additional language to require the time spent on maintenance tasks
 - Removing optional recording of customer service metrics

Original File Rules

- **Disruption of Service (OAC 3745-83-02)**
 - Changes to disruption of service types, clarifications
 - Filed on 7/16/24, completed JCARR hearing and preparing to final file soon
- **Operator Certification**
 - Filed on 8/23/24, JCARR hearing on 9/23/24, preparing to final file



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Operator Certification Key Changes Proposed

Changing “wastewater treatment” to “water reclamation”

Offering holiday and other staffing flexibility

Creating new “facility-specific” classification

Reducing required operating experience time for Class II, III and IV

Adding operator in training (OIT) status for Class III and increase OIT time

Adding flexibility to review reciprocity



FUNDING AND TECHNICAL ASSISTANCE



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H2Ohio Distribution Equipment Grants

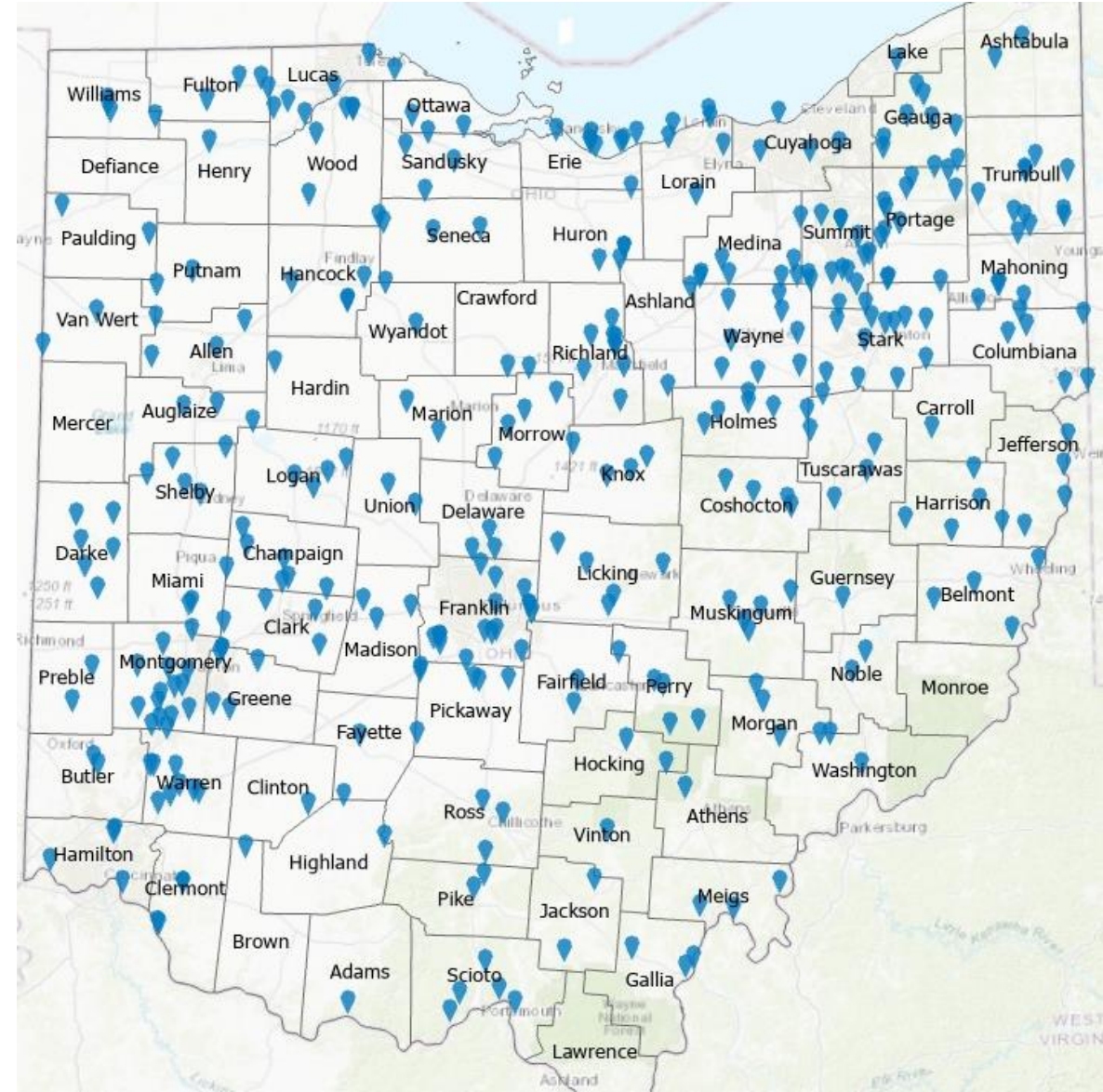
Round 1

- 111 applications
- \$1,000,000 awarded

Round 2

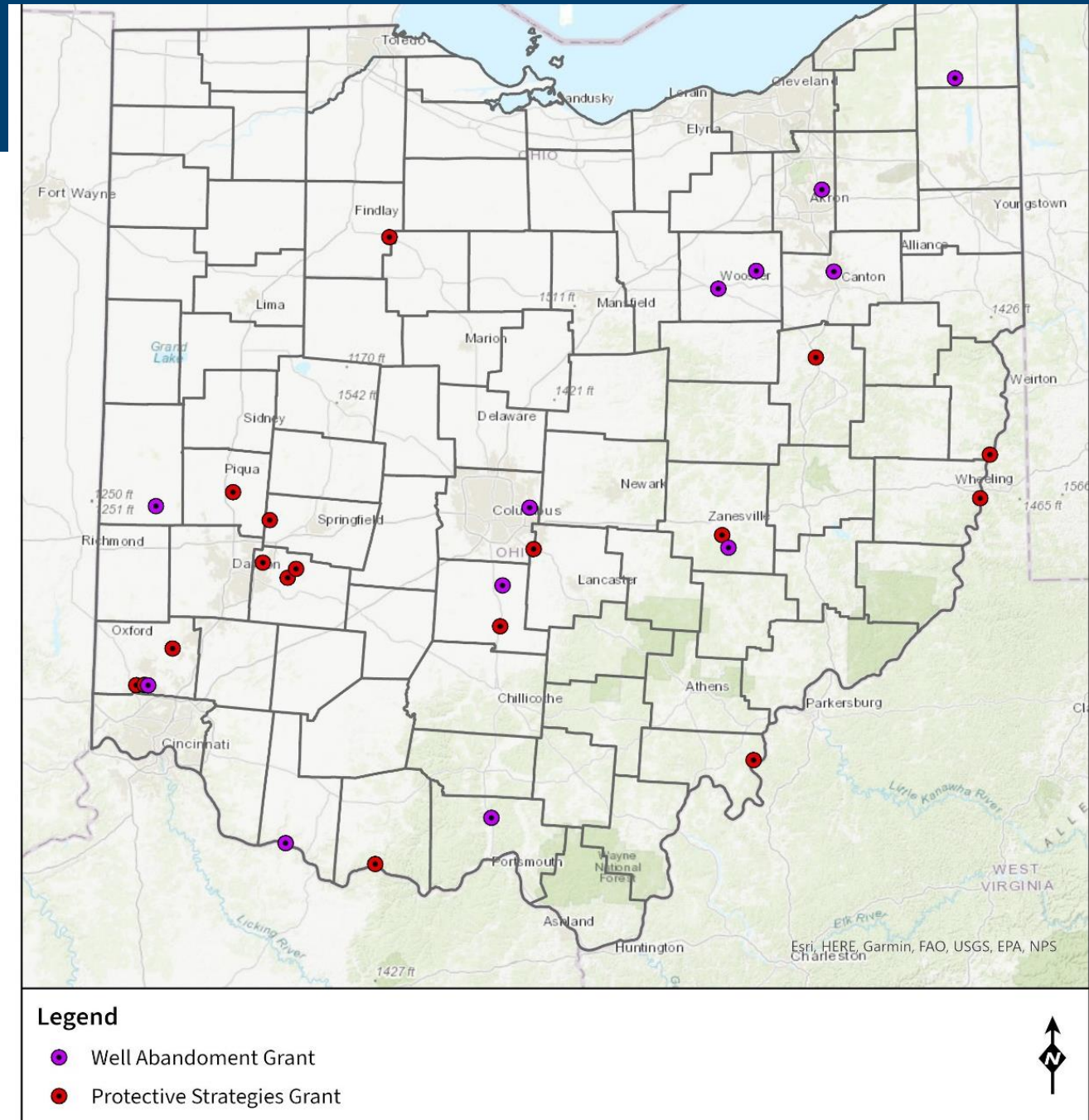
- 259 applications
- \$2,232,000 awarded

Total of over \$3.2 M awarded



2024 Small Grants Awarded

- Award letters sent!
- SWP Strategies Grant
 - ~\$360,000 to 23 PWS
- Well Abandonment Grant
 - ~\$253,000 to 12 PWS
- Emergency Generator Grant
 - \$1,326,242 awarded to 37 PWS



Service Line Inventory

Direct Assistance Contract

- \$18 million
- Contracted with two vendors to meet the needs of Ohio's PWS – Arcadis, Mannik, and Smith
- 140 PWS have requested assistance
- Contractor will be sent out to provide assistance - No charge
- Assistance includes inventory development, identification, replacement plans
- All community and not for profit NTNCs can receive assistance



Water Audit and Water Loss Control Program Grant

- \$1 million available this fall, up to \$20k per award
- Assist small community public water systems
- Contracting with a third-party to assist with a water audit and water loss control program development
- Eligible items:
 - A thorough water audit
 - A plan or intervention process to address findings of the water audit and reduce or eliminate water losses, and
 - An evaluation to determine if steps taken to address water loss issues have been successful



Grants coming Fall 2024

- Well Abandonment Grants
 - \$250k available, up to \$15k per well
- Source Water Protective Strategies
 - \$500k available, up to \$20k per strategy
- Emergency Generator Grant
 - \$1,250,000 available, up to \$50k per award



How to Participate and Stay Engaged

- Update contact information with inspectors
- Follow Ohio EPA on social media
- Follow WSRLA program announcements
- Questions: infrastructurefunding@epa.ohio.gov

WSRLA



DDAGW Grants



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Federal Co-regulation

- U.S. EPA Co-regulation
 - Inspections – estimate 12/yr in Ohio (inspection vs survey)
 - Points of emphasis: RTCR and LCR sample siting, DBP representative sampling
 - Enforcement priorities: health-based violations, LCR, enforcement tracking tool (ETT) points



Thank You

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epa.ohio.gov/ddagw/

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