

OTCO Water Workshop

March, 2016

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DDAGW



Well Standards & Plan Approval

- Major revisions to rules include:
 - Clarifying nonpotable well requirements.
 - Revising step drawdown and constant rate testing requirements to ensure accurate evaluation of well productivity.
 - Updating AWWA standard C654, Disinfection of Wells to 2013 version.
 - Updating technical documents that are rule by reference.
 - Adding plan approval exemptions for hauled water systems, and for small ground water systems installing ion exchange water softeners and cartridge filters.
- Intend to file revisions with JCARR by the end of March.
 - Effective in May 2016.

Operational Requirements & Operator Certification

- Operational Requirements (3745-83-01) revisions included:
 - Noncommunity PWSs < 1,000 that opt to chlorinate to meet minimum chlorine residual unless it's used solely for oxidation of iron manganese or hydrogen sulfide.
 - Monthly operating reports (MORs) to be signed by Operator of Record.
 - Maintain MORs to be kept for 10 years, except for lead and copper which is 12 years.

Operational Requirements & Operator Certification (cont.)

- Operational Requirements revisions (cont.):
 - Updated AWWA standard C651, Disinfecting Water Mains to 2015 version.
- Operator Certification (3745-7-01 and 3745-7-03) revisions included:
 - Revised PWS definition to reference primary drinking water rule, PWS definition (3745-81-01)
 - Clarified classification of PWSs, including satellite/consecutive systems.

Operational Requirements & Operator Certification (cont.)

- Operator Certification revisions (cont.):
 - Required class 1 operators for transient noncommunity PWSs < 250 with 4-log disinfection or nitrate removal treatments.
- Revisions were adopted on Feb. 23, 2016.
 - Revisions effective on March 4, 2016.

Rules Filed with No Changes

- Escrow Requirements (Chapter 3745-92)
- Secondary Drinking Water Standards (3745-82-01, definitions)
- Emergency Loans (3745-86-01)

Revised Total Coliform Rule (RTCR)

- Adopting Federal RTCR provisions, which become effective April 1, 2016.
 - PWSs required to investigate conditions more rapidly to look for and eliminate sources of contamination.
- Consecutive surface water systems will monitor in accordance with federal counterpart.

RTCR (continued)

- Seasonal systems triggered into monthly monitoring will remain on schedule until special monitoring evaluation can take place.
- Clarified PWSs required to respond to written correspondence from Ohio EPA.
- Public hearing was Feb. 18 and JCARR hearing, Feb. 29.
 - Adopt as final by March 21, 2016, at the latest.
 - Effective on April 1, 2016.

Harmful Algal Bloom (HABs)

- **New Chapter 3745-90**
 - Establish action levels for microcystins.
 - Establish cyanobacteria screening, and microcystins monitoring and reporting for surface water PWSs.
 - Increased monitoring for detections of microcystins greater than 5 micrograms per liter.

HABs (continued)

- New Chapter 3745-90 (cont.):
 - PWSs to submit written cyanotoxin treatment optimization protocols if microcystins detected in raw or finished drinking water.
 - PWSs may be required to submit cyanotoxin general plan.
 - Public notification required when monitoring violations and exceedances of action levels in drinking water.

HABs (continued)

- **New Chapter 3745-90 (cont.):**
 - Consumer confidence reports to include cases of monitoring violations and exceedances of action levels in drinking water.
 - Establish requirements for laboratory certification, analytical techniques and reporting deadlines.
- **Public hearing was Feb. 24 and JCARR hearing is on March 21. Adopt by end of March.**
 - **Effective June 1, 2016.**

Secondary Drinking Water Standards

- **Revise rule, monitoring for compliance with secondary maximum contaminant levels (3745-82-03)**
 - Revise fluoride provisions in rule to base compliance with 0.8 mg/L – 1.3 mg/L range on a monthly average.
- **Preparing to file revisions with JCARR.**
 - Intend revisions to be effective late May.

Contingency Plan

- Draft revisions to rule 3745-85-01, PWS contingency plans.
- Intend to start interested party review in April. Revisions include:
 - Clarify types of PWSs required to prepare and maintain plan.
 - Clarify definition and purpose of plan.
 - Clarify and expand required contents of plan.

Contingency Plan (continued)

- Revisions include (cont.):
 - Clarify where plan is required to be kept and for whom it should be available.
 - Establish requirement to exercise the plan.
 - Establish plan is not public record.
 - Establish requirement to provide emergency contact information of designated PWS representative who will respond to emergency.

Upcoming in 2016 – 2017

- Iron and Manganese
- Plan approval changes
- Monitoring requirements
 - Health Advisory Levels
- Aesthetics are **IMPORTANT**
- Operator Certification

Upcoming in 2016 - 2017

- *Capability Assurance Plans (Chapter 3745-87)*
- *Yard Hydrants (3745-95-09)*

Lead – New Expectations

- CDC/USEPA – No safe level determined
- Lessons learned
 - Regulations do not meet public expectations
- Lead letter with new expectations sent
- March 2, 2016

Lead - New Expectations

- ANY result over 15 ug/L
- Two business days - hand deliver or phone with certified mail
- Notify local health department
- Provide information on health screenings and lead blood levels
- Five days – submit verification to Ohio EPA

Lead – New Expectations

- **Action Level Exceedance**
- Issue new release within 24 hours
- 30 days – issue public education – New Language
- Next business day – notify local health department & obtain information on testing for public education

Lead – New Expectations

- ALE continued:
- Offer consumer requested sampling where likely to have lead lines, solder or fixtures
- Provide information on health screenings and blood lead level testing in Public Education
- Within 5 business days of requirements – verify to Ohio EPA
- Submit 5105 Form by end of each month results are received

Other Lead Changes

- Sampling protocol changes – end pre-flush
- Determine ALE with minimum # of samples
- Cease “testing out”
 - ALE determinations
 - Optimal corrosion control
- More frequent sampling
- Rule changes

Lead - USEPA

- Proposing rule 2017
- Interim requests to Governors and Directors
- Tracking all ALEs
- Posting all results
- Sampling protocols
- Tier 1 sample determinations

Drinking Water Fix Public Trust

