

# 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