

52nd Annual Water Workshop

Ohio EPA Update

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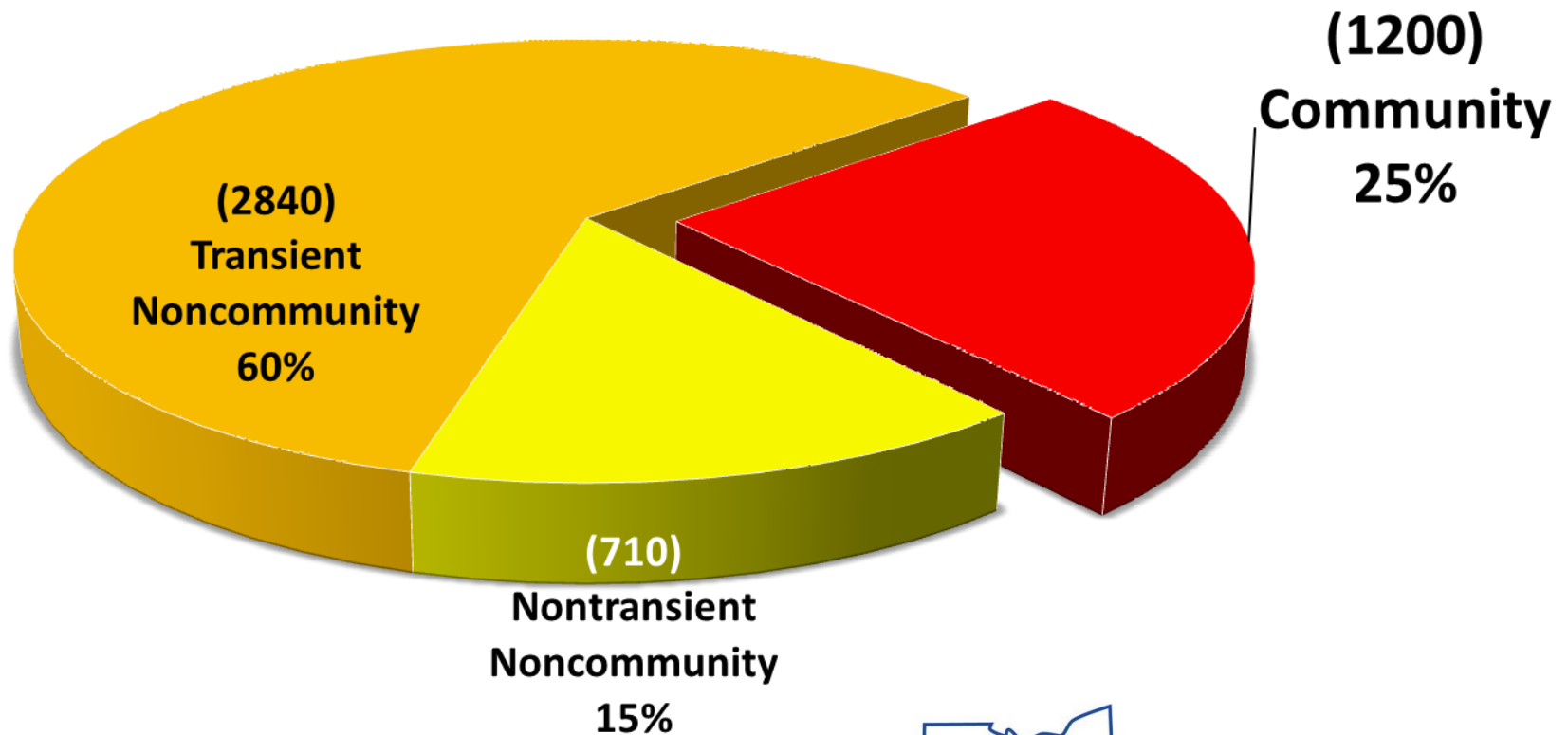
Overview

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

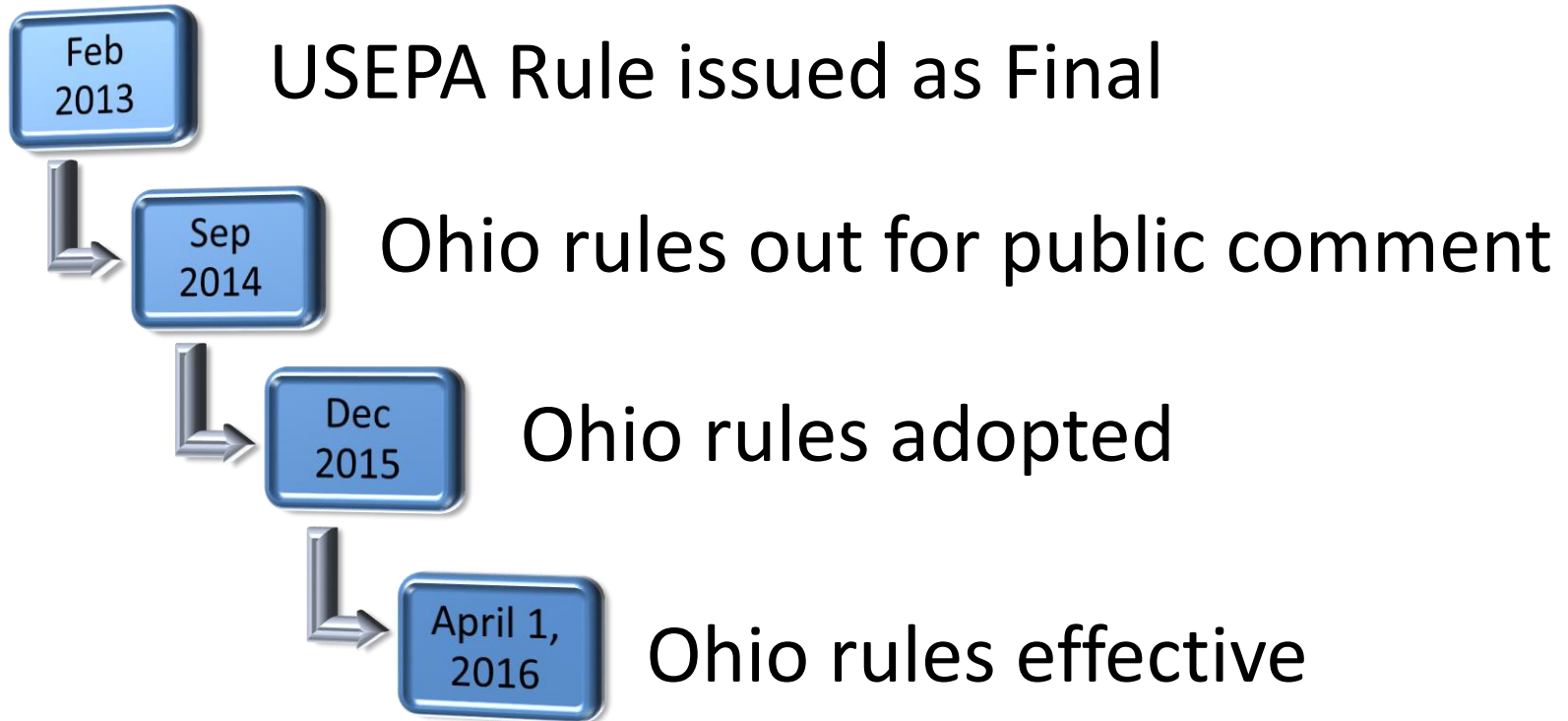


Public Water Systems in Ohio

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
 - 3 repeats instead of 4
 - Routine samples in month following a TC+ 3 instead of 5
 - Go from Quarterly to monthly routine monitoring
 - Clean compliance history and can go back to quarterly



Big Picture (continued)

- 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

- Locations and numbers for routine and repeat locations
- Dedicated repeat sampling points
 - *Representative of pathways for contamination*
- 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
- In the 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



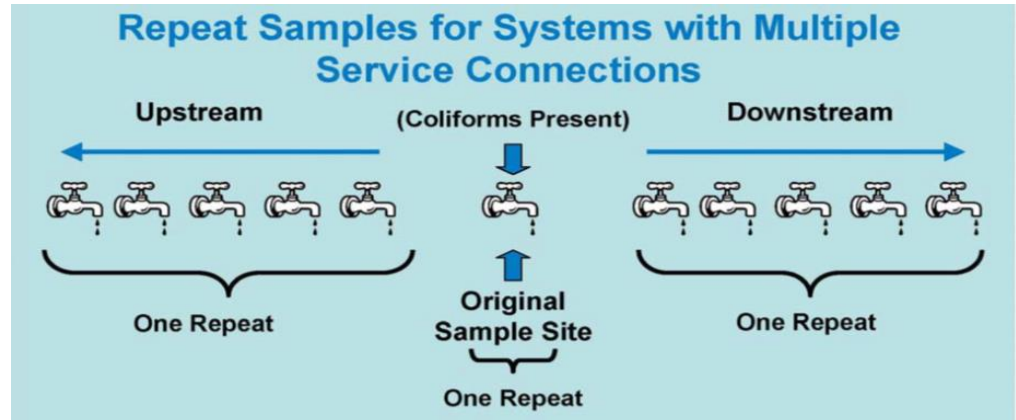
RTCR Basics - Routine Monitoring

- 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
 - Triggers a Level 1 Assessment
- Consecutive GW Systems must notify supplier



RTCR Basics - Violations

- *E. coli* MCL violation – Tier 1 PN

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



- Treatment technique violations – Tier 2 PN
- 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. (NOVs after 1st qtr)
- 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

- EPA has posted a revised list of The FAQs can be found at:

<http://water.epa.gov/drink/info/lead/upload/epa815s13001.pdf>



Lead Free Update

- Repairs have been clarified
- Hydrants exempted from coverage
- Still some problematic language
- 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 formed



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 EPA 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

- Prior to being placed into service or being returned to service after repairs, inspections, painting, cleaning, or other activities that might lead to contamination, finished water storage facilities serving noncommunity water systems serving a population ≥ 1000 and all community water systems, shall:
- Meet the requirements of AWWA standard C652-02 Disinfection of Water-Storage Facilities; and
- Be monitored for chlorine residual and comply with the minimum chlorine residuals and the MRDLs established in paragraph (C) of OAC Rule 3745-81-10



Returning waterlines to service

- Unless a minimum pressure of twenty pounds per square inch gauge at ground level is maintained at all points in the distribution system, prior to being placed into service or being returned to service after repairs, inspections, or other activities that might lead to contamination, Water mains serving noncommunity water systems serving a population ≥ 1000 and all community water systems, shall:
 - Meet the requirements of AWWA Standard C651-05 "Disinfecting Water Mains"; and
 - Be monitored for chlorine residual and comply with the minimum chlorine residuals and the MRDLs established in paragraph (C) of OAC Rule 3745-81-10



Harmful Algal Blooms

- Collected over 200 cyanotoxin samples at 28 PWSs
- Dealt with a detection of Microcystin in finished water
- Detected euglenophycin in a sample
- Meetings with USEPA, NOAA, CDC and others to share information
- Added points to DWSRF ranking system
- Developed a survey to determine algal impacts



Backflow Rules

- Working on addressing Commerce's recent comments
- Sub-group formed for unresolved items
 - Ohio EPA
 - PWS – ORWA and OAWWA
 - Commerce
- Manual is being revised to address comments
- Reopen booster pump rule to address conflicts



Miscellaneous Items

- Ohio EPA and AWWA finishing white papers
 - aeration and distribution optimization
- SRF nominations were due March 1, 2014
- Focus on contingency plans



Questions?

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