

September 2012

# Capability Assurance Strategy Annual Report Program Year 2012



John R. Kasich, Governor  
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## Introduction

This Capability Assurance Strategy Annual Report was prepared by the Ohio Environmental Protection Agency (Ohio EPA), Division of Drinking and Ground Water (DDAGW), in fulfillment of the reporting requirements of the United States Environmental Protection Agency (U.S. EPA) *Guidance on Implementing the Capacity Development Provisions of the Safe Drinking Water Act Amendments of 1996* that requires:

*Each year, as a stand-alone submittal or as part of the state's capitalization grant application, the state must provide documentation showing the ongoing implementation of the capacity development strategy.*

The report follows the format specified in a memorandum from Cynthia Dougherty, Director, Office of Ground Water and Drinking Water, on June 1, 2005 regarding "*Reporting Criteria for Annual State Capacity Development Program Implementation Reports*". This report is based on data for State Fiscal Year (PY) 2012 which covers the period July 1, 2011 through June 30, 2012.

## New Public Water Systems

Ohio Revised Code Sections 6109.24 and 6109.22(M) and Ohio Administrative Code Chapter 3745-87 provide for Ohio's legal authority to implement the new systems program.

All new public water systems must submit a capability assurance plan prior to detail plan approval and start-up of the system.

Between July 1, 2009 and June 30, 2012, 56 community and non-transient non-community public water systems were activated. Table A-1 contains a list of the activated systems. The activated systems list was reviewed to determine which systems are truly new versus found, existing systems or for new satellites of existing systems. DDAGW determined 20 systems are new systems, they are listed in Table A-2.

Of the 20 activated systems that are required to have a CAP, four systems have not completed a CAP. We are working with them to have a CAP completed. Two of the systems are considered significant non-compliers. Both of these systems were absorbed into another water system.

## Existing Public Water Systems

Listed below are the programs, tools and activities utilized during PY 2012 to assist existing public water systems in acquiring and maintaining technical, managerial and financial capacity.

- Continued use of a new sanitary survey process utilizing more capability related questions and Capability Assurance Evaluation Forms;
- Compliance and Operational Review Meetings (CORMs);
- Continued use of the Ohio RCAP List as a proactive measure to assist small systems that are having financial or managerial problems;
- Mailed postcards, sent electronic phone messages and made personal calls to public water systems as reminders to complete required compliance monitoring;
- Utilized a ListServ to communicate information to public water systems and laboratories;
- Targeted systems on the enforcement priority list; and
- Offered free technical, managerial and financial training to public water systems.

## Who needs assistance and what type is needed?

Ohio continues to identify systems in need of capacity development assistance by using a multi-tiered approach.

Track and enforce requirements through the **sanitary survey process**

Identify systems needing managerial and/or financial assistance to achieve or maintain compliance through **the Ohio RCAP list** process

Identify systems needing capability improvements through the **enforcement** priority list compiled quarterly

Prioritize and improve existing system capacity by sending **reminder postcards, electronic phone messages and personal phone calls** to systems that are near the end of the monitoring period and have not monitored as required.

### ***Sanitary survey process***

All community water systems greater than 250 in population have a Capability Assurance Evaluation Form completed at the time of their sanitary survey. The capability indicators are reviewed at the conclusion of the sanitary survey by completing the Capability Assurance Evaluation Form.

During PY 2012, 300 capability assurance evaluation forms were completed. The capability assurance evaluation forms were completed as a part of the sanitary survey process. Staff education and continued implementation occurred during PY 2012.

### ***Ohio RCAP List***

The Ohio RCAP list includes only community water systems serving 10,000 or less in population. Systems intended for this list are those that need financial and/or managerial technical assistance to achieve or maintain compliance. A system placed on the Ohio RCAP list and receives the needed assistance may graduate to the PPL/IPL when it is ready to proceed with a project being funded through the Drinking Water State Revolving Loan Fund. Twenty six small systems were placed on the Ohio RCAP List during PY 2012.

### ***Enforcement***

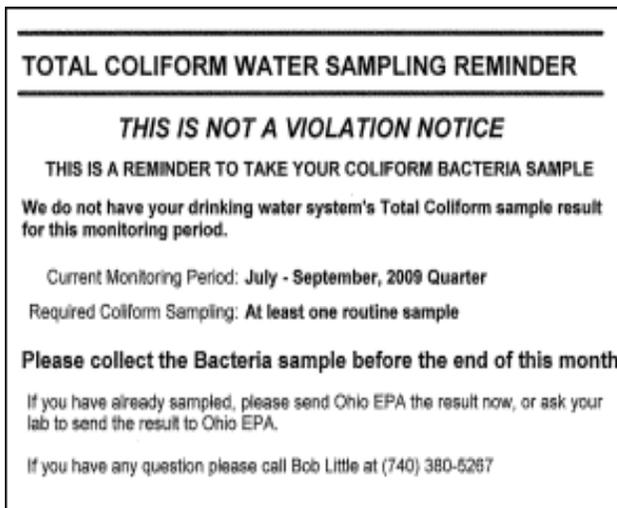
During PY 2012, DDAGW exceeded our commitment to U.S. EPA to address or resolve at least 122 systems in Significant Non-Compliance (SNC) which is now defined as systems with Enforcement Targeting Tool (ETT) scores of 11 or greater, by addressing more than 168 SNCs. These systems were addressed/resolved by systems returning to compliance, DDAGW completing an enforcement action with systems, correcting/updating our database, and by inactivating systems no longer in operation.

## **Reminder postcards and Electronic Phone Messages**

Another measure Ohio has taken to prioritize and improve existing system capacity is sending reminder postcards to systems that are near the end of the monitoring period and have not monitored.

During PY 2012:

- Approximately 6,200 **total coliform bacteria** reminder postcards and 3,500 electronic phone messages were sent to systems that had not monitored yet during the reporting period;
- Of the postcards sent to public water systems to remind them to take a total coliform bacteria sample; approximately 6,100 systems completed their monitoring (98 percent of the systems);
- Approximately 5,000 **chemical/radiological** reminder postcards and 2,000 electronic phone messages were sent to all public water systems that had not yet completed monitoring;
- Of the postcards sent, approximately 4,500 systems monitored (90 percent of the systems).



The benefit for capacity assurance is two-fold with the reminder postcard and electronic phone message programs. First, it speaks specifically to the managerial capacity of the system. We are providing the systems with a specific tool to better manage their public water system. Second, if a system that typically does not monitor, does monitor for the contaminant and a maximum contaminant level is found, it gives Ohio EPA the ability to work with the system to improve the technical capacity of the system. These actions have increased the overall compliance of public water systems in Ohio.

## **Electronic service communication (ListServ)**

An additional form of communication which encourages compliance and furthers system capability is the ListServ communication tool the drinking water program is currently using. The nine electronic mailing lists being used by DDAGW are as follows:

- operator certification with 799 subscribers
- drinking water assistance fund with 585 subscribers
- drinking water monitoring and compliance with 720 subscribers
- drinking water rules update with 1257 subscribers
- underground injection control rules with 649 subscribers
- eDWR labs with 577 subscribers
- eDWR PWSs with 1191 subscribers
- Spigot News electronic with 1009 subscribers
- Spigot New (hard copy) with 272 subscribers.

The electronic mailing lists provide systems and laboratories with quick and timely updates on drinking water monitoring and compliance issues, federal and state drinking water rule making, operator certification information, state revolving fund information and Stage 2 Disinfectants and Disinfection Byproducts Rule.

### **Local government, system management and operator training**

Each year Ohio EPA DDAGW provides funding to W.S.O.S Community Action Commission, Inc., Great Lakes Rural Community Assistance Program (Ohio RCAP) to present training courses as part of the Drinking Water Assistance Fund program goals and objectives. These one-day courses are free and targeted to board members, mayors, water system superintendents and operators and are as follows:

*Utility Management for Local Officials* training includes an overview of the three capacity components; managerial, technical and financial;

*Financial Management for Local Officials* training focuses on financial management, record keeping, and an overview of the theory asset management of a public water system;

*Asset Management, Budgeting & Rate Setting for Local Officials* training has participants actually do a hands-on asset management plan using the USEPA Step guide, show how the plan effects budgeting and how rate setting is effected with this data and what to consider when setting rates;



*Applied Asset Management Featuring CUPSS* training includes an introduction to Check Up Program for Small Systems (CUPSS), an overview of the software and hands-on use of the program.

During PY 2012:

- 3,906 brochures were emailed and were sent regular mail to community public water systems serving 10,000 or fewer in population announcing each course
- 30 training sessions were held statewide
- 306 people in attendance
- 225 systems represented.

This type of outreach and education is important for our current existing system strategy to educate existing systems and increase their capability.

There were two mailings: one for the fall scheduled training sessions and one for the spring training sessions. For the fall training, 846 brochures were emailed and 721 for the spring training. There were 1,162 hard copy brochures post mailed for the fall training and 1,177 for the spring training. Additional mailings go to several associations and organizations such as Ohio American Water Works Association (OAWWA), Ohio Water Environment Association (OWEA), Ohio Rural Water Association (ORWA), Operator Training Committee of Ohio (OTCO), United States Department of Agriculture Rural Development (USDA-RD), County Commissioners Association (CCA), Ohio Municipal League (OML), Ohio Department of Development (ODOD), Ohio Water Development Authority (OWDA), and Ohio EPA central office and all five districts. RCAP also promotes with brochures at OAWWA, OWEA, ORWA, and other statewide exhibit shows throughout the year.

### **Additional program activities**

Ohio partnered with the Ohio Campground Owner's Association to provide free training to public water systems that operate campgrounds. Topics included operations, license to operate, groundwater, source water protection, total coliform sampling and operator certification. A total of 35 people received training.

## Planning for future changes

Ohio is planning diligently for upcoming changes that effect how Ohio uses capacity in our everyday dealings with public water systems.

Our Information Management Section has developed and implemented a new web-based reporting application for public water systems (PWS) and certified laboratories. The application was deployed in July 2009 and is now available for use by all PWS and labs. As of July 1, 2010, all certified labs were required to use the new reporting application. The new reporting application is a part of Ohio EPA's eBusiness Center and promotes more efficient exchange of information between water systems, labs and Ohio EPA. Public water systems will also be required to use the new reporting applications to submit their monthly operating reports (MORs). This requirement is being phased in based on system population, with the largest systems required to begin by July 1, 2012 and the smallest systems by July 1, 2014.



Ohio implemented positions in each district office called District Office Compliance Coordinators, or DOCCs, in PY 2007 and the positions continued through PY 2012. These individuals work as a lead worker at the district level and come together at regularly scheduled meetings to improve statewide consistency issues and business processes in an effort to increase capability and compliance of public water systems statewide.

## Capability assurance plans (CAPs)

Capability assurance plans are **required** for all new community and non-transient non-community public water systems and all Drinking Water Assistance Fund (DWAF) planning, design and construction loan awardees. Capability assurance plans for systems less than 10,000 population can be completed with assistance from Ohio RCAP free of charge to the public water system.

During PY 2012:

- 45 DWAF loans were awarded; and
- All of these systems had approved capability assurance plans (36 individual systems).

## Strategy Implementation and Modification

Ohio regularly reviews and makes minor revisions to accomplish greater capacity assurance in Ohio's public water systems. It is not a formal review; however, initiatives for working better with existing systems to encourage compliance and capability are never far from our mind. We are continually working on optimizing our program by adding initiatives that are low cost to implement.

The addition of the capability assurance evaluation forms, capability assurance questions to the sanitary survey and the CORM are initiatives that were incorporated recently in the existing strategy. Other strategies including education and technical assistance have always existed but initiation of additional/different activities were increased for both areas this year with the addition of the Ohio RCAP list. Systems placed on this list receive financial, managerial and technical assistance and other educational tools to maintain compliance and/or prevent enforcement issues.

## **Conclusion**

Ohio continues to take a proactive stance in assuring system capability. We work with new systems, systems receiving a DWAFF loan and existing systems having capability related issues. We are always interested in exploring new initiatives that will increase the capability of the public water systems in Ohio utilizing our available resources. Please contact the Division of Drinking and Ground Water at (614) 644-2752 if you have questions about Ohio's capability assurance program, have suggestions for improvement to our program.

**Table A-1**

Activated systems from July 1, 2009 to June 30, 2012

56 total

PWS ID #	System Name	Activity Date	County	Primary Source	Type	District
OH7542512	FAIRLAWN K-12 SCHOOL	08/20/09	SHELBY	GW	NTNC	SWDO
OH2348012	SHALOM UNITED METHODIST CHURCH PWS	09/03/09	FAIRFIELD	GW	NTNC	CDO
OH5054412	PURPLE CAT DAY HABILITATION CENTER	10/06/09	MAHONING	GW	NTNC	NEDO
OH3946712	NORW - SOUTH DISTRICT	10/29/09	HURON	SWP	C	NWDO
OH8532012	D + S HILLCREST PWS	11/12/09	WAYNE	GW	NTNC	NEDO
OH2101203	WESTERVILLE ESTATES MHP	01/11/10	DELAWARE	SWP	C	CDO
OH4565912	LITTLE VILLAGE DAY CARE PWS	01/21/10	LICKING	GW	NTNC	CDO
OH3850312	PROVIA DOOR PWS	02/22/10	HOLMES	GW	NTNC	NEDO
OH3850512	GOSPEL HAVEN MENNONITE CHURCH PWS	03/24/10	HOLMES	GW	NTNC	NEDO
OH3740512	OLD STRAITSVILLE-ROCKBRIDGE	04/01/10	HOCKING	GWP	C	SEDO
OH3248312	VANLUE VILLAGE WATER	04/28/10	HANCOCK	GW	C	NWDO
OH4564712	BUCKEYE LAKE, VILLAGE OF PWS	05/03/10	LICKING	GWP	C	CDO
OH3850612	WALNUT CREEK PLANING PWS	05/26/10	HOLMES	GW	NTNC	NEDO
OH7430612	CARMEUSE LIME INC-MAPLE GROVE OPER PWS	06/02/10	SENECA	GW	NTNC	NWDO
OH2956203	GREENE COUNTY - FAIRBORN	08/02/10	GREENE	GWP	C	SWDO
OH5054712	SOUTH RANGE LOCAL SCHOOL K-12 PWS	10/06/10	MAHONING	GW	NTNC	NEDO
OH7057112	FAITH UM CHURCH OF RICHLAND COUNTY	10/06/10	RICHLAND	GW	NTNC	NWDO
OH4566012	GRATIOT IMPROVEMENT ASSOCIATION	10/25/10	LICKING	GW	C	CDO
OH4566112	EAST END WATER CO	11/12/10	LICKING	GW	C	CDO
OH7853912	SHIVELY LAND COMPANY PWS	11/15/10	TRUMBULL	GW	NTNC	NEDO
OH8752712	NORTHWESTERN W AND SD-FOSTORIA NORTH	11/22/10	WOOD	SWP	NTNC	NWDO
OH6045712	MY PITTER PATER LEARNING CTR PWS	12/08/10	MUSKINGUM	GW	NTNC	SEDO
OH8563912	BURBANK PARKE PWS	12/13/10	WAYNE	GW	C	NEDO
OH2637812	NORTHEAST WATER SYSTEM	01/01/11	FULTON	SWP	C	NWDO
OH7806503	TRUMBULL COUNTY - BRACEVILLE TWP PWS	01/24/11	TRUMBULL	SWP	C	NEDO
OH5801103	WEST MALTA RURAL WATER PWS	02/16/11	MORGAN	GWP	C	SEDO
OH3539212	HENRY COUNTY REGIONAL WSD	02/22/11	HENRY	SWP	C	NWDO
OH5553212	WEST CHARLESTON CHURCH OF THE BRETHREN 2	02/28/11	MIAMI	GW	NTNC	SWDO
OH7700021	UPS-RICHFIELD SERVICE CENTER PWS	03/04/11	SUMMIT	GW	NTNC	NEDO
OH8557112	TRING CORPORATION	04/04/11	WAYNE	GW	NTNC	NEDO
OH2876312	METZENBAUM TRANSPORTATION GARAGE PWS	04/05/11	GEAUGA	GW	NTNC	NEDO
OH8752812	NORTHWESTERN W AND SD -TOLEDO SVCE AREA	05/01/11	WOOD	SWP	C	NWDO
OH7259312	LAKOTA PRE K-12 SCHOOL	06/27/11	SANDUSKY	GW	NTNC	NWDO
OH2857812	ASM INTERNATIONAL	07/01/11	GEAUGA	GW	NTNC	NEDO
OH8549112	JAKES RESTAURANT	07/05/11	WAYNE	GW	NTNC	NEDO
OH4533512	EAGLE WINGS ACADEMY INC. PWS	07/13/11	LICKING	GW	NTNC	CDO
OH7855712	SOUTHINGTON LOCAL SCHOOL NEW PWS	07/22/11	TRUMBULL	GW	NTNC	NEDO
OH3850812	CKS PROPERTIES INC PWS	07/22/11	HOLMES	GW	NTNC	NEDO
OH1566212	BUCKEYE TRANSFER INC	08/01/11	COLUMBIANA	GW	NTNC	NEDO
OH7542312	HARDIN-HOUSTON K-12 PWS	08/01/11	SHELBY	GW	NTNC	SWDO
OH1950512	FRANKLIN MONROE SCHOOL NEW PWS	08/05/11	DARKE	GW	NTNC	SWDO
OH6789112	AURORA CITY - CLEVELAND PWS	09/29/11	PORTAGE	SWP	C	NEDO
OH0637912	V H ALLMAN SUBDIVISION	09/29/11	AUGLAIZE	GW	C	NWDO
OH2872012	BAINBRIDGE TOWNSHIP POLICE STATION PWS	10/01/11	GEAUGA	GW	NTNC	NEDO
OH7049112	INNOVATIVE CARE AND SERVICES LLC	11/14/11	RICHLAND	GW	NTNC	NWDO
OH5938412	HIDDEN LAKES CAMPGROUND	11/22/11	MORROW	GW	C	CDO
OH5441912	FOUNDATIONS BEHAVIORAL HEALTH SERVICES	11/22/11	MERCER	GW	NTNC	NWDO
OH7700025	KRIEGERS MARKET PWS	12/01/11	SUMMIT	GW	NTNC	NEDO
OH5942712	NORTHMOR SCHOOL PWS	01/03/12	MORROW	GW	NTNC	CDO
OH6785212	ENERVEST HARTVILLE OFFICE	01/10/12	PORTAGE	GW	NTNC	NEDO
OH4560932	LONGABERGER CLUBHOUSE PWS	01/12/12	LICKING	GW	NTNC	CDO
OH4339112	LITTLE LEARNER'S DAYCARE	01/18/12	LAKE	GW	NTNC	NEDO
OH3946912	FIRELANDS MANOR MHP PWS	01/27/12	HURON	SWP	C	NWDO
OH2563912	VIDA NUEVA CHURCH PWS	02/09/12	FRANKLIN	GW	NTNC	CDO
OH8841212	TRILLIUM FARM HOLDINGS, LLC	03/20/12	WYANDOT	GW	NTNC	NWDO
OH5548312	PLASTIC RECYCLING TECHNOLOGIES, INC.	04/02/12	MIAMI	GW	NTNC	SWDO

**Table A-2**

New systems from July 1, 2009 to June 30, 2012  
20 total

PWS ID	System Name	Type	Activity Date	County	District	CAP Req'd	CAP Rec'd	Comments	SNC (ETT equal to or greater than 11)
OH4564712	BUCKEYE LAKE, VILLAGE OF PWS	C	5/3/2010	LICKING	CDO	Yes	Yes		No
OH5938412	HIDDEN LAKES CAMPGROUND	C	11/22/2011	MORROW	CDO	Yes	No	<b>Requested</b> - In process of connecting to neighboring PWS	No
OH4565912	LITTLE VILLAGE DAY CARE PWS	NTNC	1/21/2010	LICKING	CDO	Yes	Yes		No
OH5942712	NORTHMOR SCHOOL PWS	NTNC	1/3/2012	MORROW	CDO	Yes	No	<b>Requested</b> - This facility has a new PWS ID No. but it is due to a new building and equipment.	No
OH7806503	TRUMBULL COUNTY - BRACEVILLE TWP PWS	C	1/24/2011	TRUMBULL	NEDO	No	No	Trumbull Co has 7 PWS's. This is a satellite of the existing	No
OH8563912	BURBANK PARKE PWS	C	12/13/2010	WAYNE	NEDO	Yes	Yes		No
OH2876312	METZENBAUM TRANSPORTATION GARAGE PWS	NTNC	4/5/2011	GEAUGA	NEDO	Yes	Yes		No
OH5054712	SOUTH RANGE LOCAL SCHOOL K-12 PWS	NTNC	10/6/2010	MAHONING	NEDO	Yes	Yes		No
OH7855712	SOUTHINGTON LOCAL SCHOOL NEW PWS	NTNC	7/22/2011	TRUMBULL	NEDO	Yes	Yes	CAP received 10/09	No
OH3946712	NORW - SOUTH DISTRICT	C	10/29/2009	HURON	NWDO	No	No	Water district absorbed PWS	No
OH3248312	VANLUE VILLAGE WATER	C	4/28/2010	HANCOCK	NWDO	Yes	Yes		No
OH3539212	HENRY COUNTY REGIONAL WSD	C	2/22/2011	HENRY	NWDO	Yes	Yes	Water district absorbed McClure - CAP marked approved in AIMS 4/1/11.	Yes
OH2637812	NORTHEAST WATER SYSTEM	C	1/1/2011	FULTON	NWDO	No	No	Water district absorbed Metamora	Yes
OH8752812	NORTHWESTERN W AND SD - TOLEDO SVCE AREA	C	5/1/2011	WOOD	NWDO	No	No	Water district absorbed PWS	No
OH8752712	NORTHWESTERN W AND SD- FOSTORIA NORTH	NTNC	11/22/2010	WOOD	NWDO	No	No	Water district absorbed PWS	No
OH7259312	LAKOTA PRE K-12 SCHOOL	NTNC	6/27/2011	SANDUSKY	NWDO	No	No	School expansion	No
OH3740512	OLD STRAITSVILLE-ROCKBRIDGE	C	4/1/2010	HOCKING	SEDO	Yes	Yes		No

Table A-2 continued

PWS ID	System Name	Type	Activity Date	County	District	CAP Req'd	CAP Rec'd	Comments	SNC (ETT equal to or greater than 11)
OH5801103	WEST MALTA RURAL WATER PWS	C	2/16/2011	MORGAN	SEDO	Yes	Yes		No
OH5553212	WEST CHARLESTON CHURCH OF THE BRETHREN 2	NTNC	2/28/2011	MIAMI	SWDO	Yes	No	<b>Requested</b> - CAP requested on November 30, 2011- has not been received	No
OH1950512	FRANKLIN MONROE SCHOOL NEW PWS	NTNC	8/5/2011	DARKE	SWDO	Yes	No	<b>Requested</b>	No