

September 2011

Capability Assurance Strategy Annual Report Program Year 2011



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 (SFY) 2011 which covers the period July 1, 2010 through June 30, 2011.

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, 2008 and June 30, 2011, 50 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 systems are new systems, they are listed in Table A-2.

Of the 50 activated systems that are required to have a CAP, one system has not completed a CAP. We are working with them to have a CAP completed. Two of the systems are considered significant non-compliers, but both were absorbed into another water system.

Existing Public Water Systems

Listed below are the programs, tools and activities utilized during SFY 2011 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 reminder postcards to public water systems for 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 RPCA list** process

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

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

Utilize **electronic service communications**

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 SFY 2011, 263 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 SFY 2011.

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. Nineteen small systems were placed on the Ohio RCAP List during PY 2011.

Enforcement

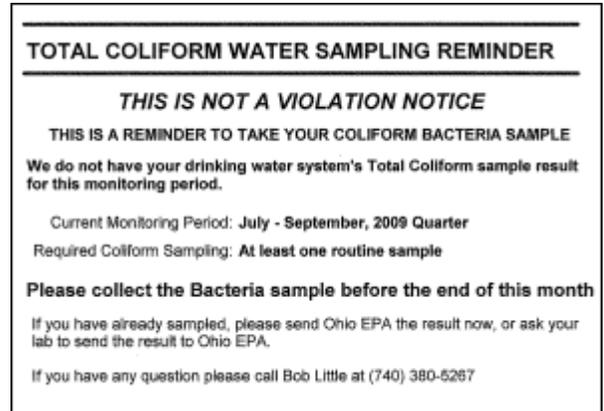
During SFY 2011, DDAGW exceeded our commitment to U.S. EPA to address or resolve at least 110 systems in Significant Non- Compliance (SNC) which is now defined as systems with Enforcement Targeting Tool (ETT) scores of 11 or greater, by addressing more than 134 SNCs. These systems were addressed/resolved 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

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 SFY 2011:

- 6,286 **total coliform bacteria** reminder postcards 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; 6,157 systems completed their monitoring (98 percent of the systems);
- 4,900 **chemical/radiological** reminder postcards sent to all public water systems that had not yet completed monitoring;
- Of the postcards sent, 4,507 systems monitored (92 percent of the systems).



The benefit for capacity assurance is two-fold with the reminder postcard program. 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. Overall this action has 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 six electronic mailing lists being used by DDAGW are as follows:

- operator certification with 579 subscribers
- drinking water assistance fund with 171 subscribers;
- compliance with 327 subscribers
- rules update with 851 subscribers
- underground injection control rules with 522 subscribers
- Long Term 2/Stage 2 with 187 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 (Stage 2) and the Long Term 2 Enhanced Surface Water Treatment Rule (LT2).

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 SFY 2011:

- 3,466 brochures were emailed and were sent regular mail to community public water systems serving 10,000 or fewer in population announcing each course
- 21 training sessions were held statewide
- 223 people in attendance
- 132 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. Both times, 792 brochures were emailed and 941 hard copy brochures were post mailed. 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 Rural Water Association (ORWA) and the Rural Community Assistance Program (RCAP) to provide free, regional training to small public water systems (populations of 3300 and under). Topics included preventative maintenance, source water protection, water loss prevention, operator certification, security and emergency preparedness, reporting via eDWR, backflow prevention and funding opportunities. A total of approximately 450 people received training, representing small community and non-community systems.

Ohio also provided two free webcasts on the new Approved Capacity document, attended by approximately 120 water system operators and engineers.

Ohio's technical assistance position at the Northeast District Office identifies and assists small systems with compliance and capacity related issues. Northeast District Office was chosen because it has the most public water systems of all the districts and many small systems with

lower compliance rates. During SFY 2011, there was continued extended compliance outreach efforts through site visits, emails, letters and phone calls. However, the compliance assistance position was vacated March 31, 2011.

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 are 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.

Ohio implemented positions in each district office called District Office Compliance Coordinators, or DOCCs, in SFY 2007 and the positions continued through SFY 2011. 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 WSRLA 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 SFY 2011:

- 34 WSRLA loans were awarded; and
- All of these systems had approved capability assurance plans (27 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 WSRLA 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, 2008 to June 30, 2011

50 total

PWS ID #	System Name	Activity Date	County	Primary Source	Type	District
OH2101203	WESTERVILLE ESTATES MHP	1/11/2010	DELAWARE	SWP	C	CDO
OH4564712	BUCKEYE LAKE, VILLAGE OF PWS	5/3/2010	LICKING	GWP	C	CDO
OH4566012	GRATIOT IMPROVEMENT ASSOCIATION	10/25/2010	LICKING	GW	C	CDO
OH4566112	EAST END WATER CO	11/12/2010	LICKING	GW	C	CDO
OH4567212	CLYDE SNIDER WATER SYSTEM PWS	12/9/2010	LICKING	GW	C	CDO
OH7676612	WILLOWTREE APARTMENTS PWS	8/29/2008	STARK	GW	C	NEDO
OH8505012	COUNTRY POINTE WOOSTER SUB-ACUTE PWS	9/5/2008	WAYNE	GW	C	NEDO
OH5260712	MEDINA CO/SOUTHERN WATER DIST PWS	6/26/2009	MEDINA	GW	C	NEDO
OH7675512	ROSE HILL WATER CO PWS	10/14/2009	STARK	GW	C	NEDO
OH8563912	BURBANK PARKE PWS	12/13/2010	WAYNE	GW	C	NEDO
OH7806503	TRUMBULL COUNTY - BRACEVILLE TWP PWS	1/24/2011	TRUMBULL	SWP	C	NEDO
OH3946712	NORW - SOUTH DISTRICT	10/29/2009	HURON	SWP	C	NWDO
OH3248312	VANLUE VILLAGE WATER	4/28/2010	HANCOCK	GW	C	NWDO
OH2637812	NORTHEAST WATER SYSTEM	1/1/2011	FULTON	SWP	C	NWDO
OH3539212	HENRY COUNTY REGIONAL W AND S DIST NORTHWESTERN W AND SD -TOLEDO SVCE AREA	2/22/2011	HENRY WOOD	SWP	C	NWDO
OH8752812	SOUTHERN PERRY CO-IRISH RIDGE	5/1/2011	PERRY	SWP	C	SEDO
OH6434912	CAMBRIDGE SKYLINE DRIVE PWS	8/1/2008	PERRY	SWP	C	SEDO
OH3054612	OH MR/GALLIPOLIS DEVELOPMENT CENTER	9/2/2008	GUERNSEY	SWP	C	SEDO
OH2700212	OH MR/GALLIPOLIS DEVELOPMENT CENTER	12/31/2008	GALLIA	GW	C	SEDO
OH3740512	OLD STRAITSVILLE-ROCKBRIDGE	4/1/2010	HOCKING	GWP	C	SEDO
OH5801103	WEST MALTA RURAL WATER PWS	2/16/2011	MORGAN	GWP	C	SEDO
OH2956203	GREENE COUNTY - FAIRBORN	8/2/2010	GREENE	GWP	C	SWDO
OH2567012	BUCKEYE LANDSCAPE PWS	11/19/2008	FRANKLIN	GW	NTNC	CDO
OH2348012	SHALOM UNITED METHODIST CHURCH PWS	9/3/2009	FAIRFIELD	GW	NTNC	CDO
OH4565912	LITTLE VILLAGE DAY CARE PWS	1/21/2010	LICKING	GW	NTNC	CDO
OH2567812	ATT PWS	2/10/2010	FRANKLIN	GW	NTNC	CDO
OH1042812	KINGS WELDING AND FAB	7/9/2008	CARROLL	GW	NTNC	NEDO
OH2875312	HERSHEY MONTESSORI SCHOOL COMM CTR PWS	8/7/2008	GEAUGA	GW	NTNC	NEDO
OH7676912	SCOTT PROCESS SYSTEMS INC PLANT 1 PWS	10/17/2008	STARK	GW	NTNC	NEDO
OH2875412	SAINT GOBAIN/CRYSTALS PWS	11/20/2008	GEAUGA	GW	NTNC	NEDO
OH4339112	CHILD GARDEN TOO	5/15/2009	LAKE	GW	NTNC	NEDO
OH5054412	PURPLE CAT DAY HABILITATION CENTER	10/6/2009	MAHONING	GW	NTNC	NEDO
OH8532012	D + S HILLCREST PWS	11/12/2009	WAYNE	GW	NTNC	NEDO
OH3850312	PROVIA DOOR PWS	2/22/2010	HOLMES	GW	NTNC	NEDO
OH3850512	GOSPEL HAVEN MENNONITE CHURCH PWS	3/24/2010	HOLMES	GW	NTNC	NEDO
OH3850612	WALNUT CREEK PLANING PWS	5/26/2010	HOLMES	GW	NTNC	NEDO
OH5054712	SOUTH RANGE LOCAL SCHOOL K-12 PWS	10/6/2010	MAHONING	GW	NTNC	NEDO
OH7853912	SHIVELY LAND COMPANY PWS	11/15/2010	TRUMBULL	GW	NTNC	NEDO
OH7700021	UPS-RICHFIELD SERVICE CENTER PWS	3/4/2011	SUMMIT	GW	NTNC	NEDO
OH8557112	TRING CORPORATION	4/4/2011	WAYNE	GW	NTNC	NEDO
OH2876312	METZENBAUM TRANSPORTATION GARAGE PWS	4/5/2011	GEAUGA	GW	NTNC	NEDO
OH0254912	SAFY	5/29/2009	ALLEN	GW	NTNC	NWDO

OH7430612	CARMEUSE LIME INC-MAPLE GROVE OPER PWS	6/2/2010	SENECA	GW	NTNC	NWDO
OH7057112	FAITH UNITED METHODIST CH-ASHLAND PWS	10/6/2010	RICHLAND	GW	NTNC	NWDO
OH8752712	NORTHWESTERN W AND SD-FOSTORIA NORTH	11/22/2010	WOOD	SWP	NTNC	NWDO
OH7259312	LAKOTA PRE K-12 SCHOOL PWS	6/27/2011	SANDUSKY	GW	NTNC	NWDO
OH6045712	MY PITTER PATTEN LEARNING CTR PWS	12/8/2010	MUSKINGUM	GW	NTNC	SEDO
OH1252312	CARMICHAEL MACHINE CORP 2 PWS	4/1/2009	CLARK	GWP	NTNC	SWDO
OH7542512	FAIRLAWN K-12 SCHOOL	8/20/2009	SHELBY	GW	NTNC	SWDO
OH5553212	WEST CHARLESTON CHURCH OF THE BRETHREN 2	2/28/2011	MIAMI	GW	NTNC	SWDO

Table A-2

New systems from July 1, 2008 to June 30, 2011

22 total

PWS ID	System Name	Type	Activity Date	County	Dist	CAP Req'd	CAP Rec'd	Comments	SNC
OH4564712	BUCKEYE LAKE, VILLAGE OF PWS	C	5/3/2010	LICKING	CDO	Yes	Yes		No
OH4565912	LITTLE VILLAGE DAY CARE PWS	NTNC	1/21/2010	LICKING	CDO	Yes	Yes		No
OH7675512	ROSE HILL WATER CO PWS	C	10/14/2009	STARK	NEDO	No	No	A CAP will no longer be required since the new development will be tying into another PWS	No
OH8563912	BURBANK PARKE PWS	C	12/13/2010	WAYNE	NEDO	Yes	Yes		No
OH7806503	TRUMBULL COUNTY - BRACEVILLE TWP PWS	C	1/24/2011	TRUMBULL	NEDO	No	No	Trumbull Co has 7 PWS's...this is just a satellite of the existing	No
OH2875312	HERSHEY MONTESSORI SCHOOL COMM CTR PWS	NTNC	8/7/2008	GEAUGA	NEDO	Yes	Yes		No
OH1042812	KINGS WELDING AND FAB	NTNC	7/9/2008	CARROLL	NEDO	Yes	Yes		No
OH2875412	SAINT GOBAIN/CRYSTAL S PWS	NTNC	11/20/2008	GEAUGA	NEDO	Yes	Yes		No
OH5054712	SOUTH RANGE LOCAL SCHOOL K-12 PWS	NTNC	10/6/2010	MAHONING	NEDO	Yes	Yes		No
OH2876312	METZENBAUM TRANSPORTATION GARAGE PWS	NTNC	4/5/2011	GEAUGA	NEDO	Yes	Yes		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
OH2637812	NORTHEAST WATER SYSTEM	C	1/1/2011	FULTON	NWDO	No	No	Water district absorbed Metamora	Yes
OH3539212	HENRY COUNTY REGIONAL W AND S DIST	C	2/22/2011	HENRY	NWDO	Yes	Yes	Water district absorbed McClure	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 PWS	NTNC	6/27/2011	SANDUSKY	NWDO	No	No	School expansion	No
OH3740512	OLD STRAITSVILLE- ROCKBRIDGE	C	4/1/2010	HOCKING	SEDO	Yes	Yes	No	No
OH5801103	WEST MALTA RURAL WATER PWS	C	2/16/2011	MORGAN	SEDO	Yes	Yes	No	No
OH5553212	WEST CHARLESTON CHURCH OF THE BRETHREN 2	NTNC	2/28/2011	MIAMI	SWDO	Yes	No	Will be requested	No