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## Drinking Water Proficiency Test Requirements

Ohio EPA requires a Proficiency Test (PT) to be completed between January 1 and December 31 each year in order to maintain laboratory certification for drinking water analysis in Ohio. The Ohio Administrative Code rule 3745-89-06 requires a PT sample be obtained from a National Environmental Laboratory Accreditation Program approved PT provider, and be analyzed for all primary drinking water contaminants by each method for which the laboratory is certified. For example, if the laboratory is certified for EPA Method 200.7 and EPA Method 200.5, the laboratory must analyze and submit PT results for each method listed on their certificate even though the same technology is used.

It is essential the test results be properly reported to the PT provider prior to the close date of the PT study. Results submitted afterward will not be accepted. Also, it is important to review all data before submitting test results to ensure information reported is accurate, meets the PT provider's requirements and is accepted by the PT provider. The following are a few items to consider prior to submitting results:

- Verify the correct method number is recorded. The method recorded on the PT study must match the method listed on the laboratory certificate or the submission will not be accepted.
- Verify results are recorded in the proper unit of measure. It is common for a laboratory instrument to produce data in one unit of measure (for instance,  $\mu\text{g/L}$ ) and the units required to be reported to the PT provider be in another unit of measure (for instance,  $\text{mg/L}$ ). Test results will be evaluated as submitted, even with incorrect units.
- Verify test results to be submitted match the results on the laboratory bench sheet. Compare results recorded on the laboratory bench sheet to the test results to be submitted to eliminate accidental transcription errors. Incorrect test results due to transcription errors will be evaluated as submitted.

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## PROFICIENCY TEST REQUIREMENTS

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All PT samples must be received, analyzed and reported in the same manner as routine samples by the same staff, facilities, procedures and equipment. Complete calibration and analysis records must be maintained to provide traceable results. Only a certified analyst may analyze PT samples. Additionally, the laboratory should retain, for their own records, a copy of the report sent to the PT provider for evaluation in case problems arise.

In the event the PT results in an unacceptable evaluation, the Laboratory Certification Section has established the following requirements:

1. After an initial unacceptable evaluation, order and complete a make-up PT from the PT provider.
2. After an unacceptable make-up evaluation, immediately cease analysis for the parameter in question and notify the Laboratory Certification Section where samples will be sent for analysis. Submit a corrective action report to the Laboratory Certification Section and promptly order a second make-up PT study.
3. After two consecutive unacceptable results, the laboratory must continue to cease analysis for the parameter in question until an acceptable evaluation is received.

Since it is not uncommon for a laboratory to occasionally receive an unacceptable evaluation on a PT, it is strongly encouraged that the initial PT be analyzed early in the year to allow for make-up tests and reduce the risk of not passing a PT study for the year, placing the laboratory's certification at risk.

For more detailed information, refer to the Proficiency Test guidance document on the Laboratory Certification webpage at [epa.ohio.gov/ddagw/labcert.aspx](http://epa.ohio.gov/ddagw/labcert.aspx).

## PUBLIC NOTIFICATION REQUIREMENTS

Public water systems must notify their water users of any violation of the Safe Drinking Water Act. This can include exceedances of maximum contaminant levels (MCLs) or failing to sample for one or more drinking water contaminants. One of the primary responsibilities of Ohio EPA's Division of Drinking and Ground Waters (DDAGW) is to ensure that public water systems (PWSs) comply with all drinking water regulations, including timely notification to consumers when there are violations. Currently, DDAGW is refocusing efforts to ensure PWSs issue public notices for all violation types in accordance with federal requirements, including the timely issuance of notices, issuing notices with the correct or approved content and following instructions for delivery methods.

PWSs that fail to issue public notification, do not follow the content requirements or do not deliver the public notice as required will receive a notice of violation (NOV) and will be required to issue or reissue their public notice. These systems will also be required to send a copy of the public notice to DDAGW within 15 days of the NOV date. With prior approval, Ohio EPA does allow a PWS to change the content of their public notice from the standard language provided with the violation letter. A copy of the revised notice must be sent via email, fax or mail to DDAGW for approval before delivery to consumers. Community water systems may use the annual Consumer Confidence Report (CCR) as a method of delivering public notices. Please note, the timing of mailing the CCR with an attached public notice must meet the one-year deadline from the date of the NOV.

Public notification requirements can be found in Ohio Administrative Code rule 3745-81-32 on the "Effective Rules" tab at [epa.ohio.gov/ddagw/rules.aspx](http://epa.ohio.gov/ddagw/rules.aspx). Questions regarding public notification can be directed to Sara Starr at (614) 644-2752.

## LEAD AND COPPER SAMPLING

Lead is a topic of discussion, recently dominating the environmental and public health communities. It has been 25 years since U.S. EPA first issued the lead and copper rule which will surely evolve as the agency revises its rule in the coming years. At the state level, Ohio EPA is aggressively working toward revising its rules in response to Ohio House of Representatives Bill 512 (HB 512) passed this last summer. HB 512 passed the Ohio General Assembly, was signed by Governor Kasich, and went into effect Sept. 9, 2016.

There have been several changes to the lead and copper program since this bill passed, and public water systems (PWSs) should take time to understand what has changed, what requirements are currently effective and evaluate how to meet the requirements. One component of HB 512 requires community PWSs to identify and map areas of the system that are known or are likely to contain lead service lines and identify characteristics of buildings served by the system that may contain lead piping, solder or fixtures. Nontransient noncommunity PWSs must identify and map areas of the system with lead piping, solder or fixtures in buildings served by the system. HB 512 requires this information to be completed and submitted by March 9, 2017. As such, each system must review their distribution system and sampling locations per Ohio Administrative Code (OAC) rule 3745-81-86.

### Sample Sites

As compliance samples are to be collected from Tier 1 sites, the mapping required under HB 512 will help PWSs identify areas to select Tier 1 sites. If there are not enough Tier 1 sites available, then Tier 2 sites are to be used to complete the sampling pool. If not enough Tier 1 or 2 sites are available, then Tier 3 sites are to be used to complete the sampling pool. (A description of Tier 1, 2 and 3 sites can be found in OAC rule 3745-81-86.)

If the distribution system contains lead service lines, 50 percent of the samples drawn during each monitoring period must be collected from sites served by the lead service lines and 50 percent from sites containing lead pipes or copper pipes with lead solder.

The minimum number of samples to be collected is based on the population served and whether the system is on standard six-month sampling or reduced sampling per OAC rule 3745-81-86.

### Compliance Samples and Special Purpose Samples

OAC rule 3745-81-86 requires results of any additional monitoring conducted shall be used in calculating the 90th percentile for lead and copper. In short, any sample which is collected per OAC rule 3745-81-86 and analyzed during the monitoring period from a properly tiered location will be considered a compliance sample.

Special purpose samples include:

- Samples taken outside the required monitoring period.
- Samples taken from a tiered site lower than the tier required.

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### LEAD AND COPPER SAMPLING...

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- Samples taken from a site where the tier is not known (cannot be determined with current information). Documentation of efforts will be required.
- For community water systems, multiple samples taken at a single monitoring site may not be counted multiple times. (The first sample would be used for compliance calculations.)
- Samples not collected in accordance with OAC rule 3745-81-86. An example would be a 250 milliliter lead fixture sample collected by schools under the Ohio Facilities Construction Commission's Lead Plumbing Fixture Replacement Assistance Grant Program.

#### **Sampling Techniques**

PWSs need to ensure proper sampling techniques are followed. If homeowners are collecting the sample, the PWS should spend time to ensure the homeowners understand the proper sampling protocols. PWSs should know which tap will be sampled, verify it is a tap regularly used for consumption, check with homeowners about whether they have any type of filter or softeners, or if they have made plumbing repairs or replacements in the past few years. Do not use taps attached to water softeners. Typical home softeners treat all the water and may significantly reduce the hardness of the water, especially if the water is already being softened, making the water more corrosive. Systems with individual residential or facility softeners should provide additional information to their customers regarding the hardness of the water provided as well as the desired hardness levels, and risks associated with softened, aggressive water. Instruction sheets to homeowners should be reviewed to ensure they meet the current requirements.

#### **Lead and Copper Sampling Dos:**

- First-draw samples (water is to have stood motionless for at least six hours).
- Collected from a cold-water kitchen tap or bathroom sink tap in a residence or in a non-residential building from an interior tap regularly used for consumption.
- Sample volume shall be one liter.
- Sample during the appropriate monitoring period (June-September for annual or triennial sampling).

#### **Lead and Copper Sampling Don'ts:**

- Don't pre-flush the tap prior to the stagnation period (six hours) or collecting the sample.
- Don't use an outside tap.
- Don't use a tap that has a point-of-use or point-of-entry treatment device designed to remove inorganic contaminants.
- Don't remove the aerator prior to sampling.

#### **LCR Forms and Sample Monitoring Point Template**

Please verify that you are using the latest forms and templates. Ohio EPA has more information available on our website at [epa.ohio.gov/ddagw/pws/leadandcopper.aspx](http://epa.ohio.gov/ddagw/pws/leadandcopper.aspx). If you have additional questions regarding lead and copper, please contact your Ohio EPA district office representative for assistance.

## REPORTING TIPS FOR LABORATORIES

In June 2016, Ohio EPA's Division of Drinking and Ground Waters (DDAGW) issued a revised fact sheet, *Reporting Tips for Laboratories* in an effort to streamline guidance for reporting sample results. Certified laboratories must report sample results electronically with specific criteria. Understanding the complexity of these criteria is essential for certified laboratories to avoid rejected reports and maintain their Ohio EPA certification, and for public water systems to maintain compliance with drinking water regulations.

The revised fact sheet is a convenient place to locate guidance and information about sample reporting across all drinking water compliance programs including details on sample types, timing, location, maximum contaminant level exceedances, contaminant codes, as well as DDAGW contacts for each monitoring program. Individual reporting information, grouped by monitoring purpose, is available in a well-organized chart. Public water systems and certified laboratories are encouraged to read and utilize the fact sheet when submitting samples for analysis and reporting analytical results.

*Reporting Tips for Laboratories* can be found on the "Resources and Reporting" tab at [epa.ohio.gov/ddagw/labcert.aspx](http://epa.ohio.gov/ddagw/labcert.aspx).

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## OHIO HOUSE BILL 512, EFFECTIVE REQUIREMENTS

Ohio House of Representatives Bill 512 (HB 512) became effective on Sept. 9, 2016. HB 512 requires Ohio EPA to adopt rules to address lead notification and testing for community water systems and nontransient noncommunity public water systems (PWSs). The bill also established requirements that became effective law on Sept. 9, 2016. The effective requirements referenced in the law are located in Ohio Revised Code Section 6109.121 and significantly shortens notification requirements for all lead and copper sample results and lead action level exceedances. The bullet points below summarize some, but not all requirements.

- Provide consumer notice of all individual tap results below the lead threshold level (15 µg/L) not later than two business days after receipt of the laboratory results. PWS to certify to Ohio EPA they complied with this requirement not later than five business days after receipt of the laboratory results.
- Provide consumer notice of all individual tap results above the lead threshold level (15 µg/L) and additional information not later than two business days after receipt of the laboratory results. PWS to certify to Ohio EPA they complied with this requirement not later than five business days after receipt of the laboratory results.

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**SPRING 2017**

### **PAPER AND PENCIL EXAM DEADLINES AND DATES**

#### Wastewater

Feb. 3, 2017  
*Application Due*

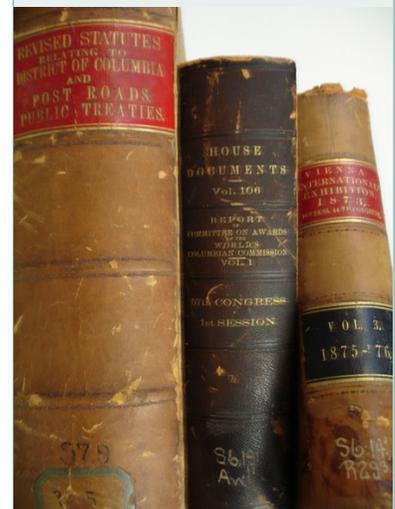
May 2, 2017  
*Exam Date*

#### Water

Feb. 4, 2017  
*Application Date*

May 3, 2017  
*Exam Date*

Call the operator certification hotline at 1-866-411-OPCT (6728) or visit [epa.ohio.gov/ddagw/opcert.aspx](http://epa.ohio.gov/ddagw/opcert.aspx) for more information.



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## OHIO EPA'S SPIGOT NEWS

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

Produced by the Division of  
Drinking and Ground Waters

Editor: Susan Kramer  
Contributing Writers:  
Mark Tomasi, Sara Starr,  
Janet Barth and Emilie  
Eskridge

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## Ohio EPA Division of Drinking and Ground Waters

P.O. Box 1049  
Columbus, Ohio 43216-1049

Phone: (614) 644-2752  
Fax: (614) 644-2909

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[epa.ohio.gov/ddagw](http://epa.ohio.gov/ddagw)

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## OHIO HOUSE BILL 512...

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- Provide lead public notification to all of the PWSs water consumers of a lead action level exceedance not later than two business days after receipt of the laboratory results. PWS to certify to Ohio EPA they complied with this requirement not later than five business days after receipt of the laboratory results.

To view the effective Ohio Revised Code in entirety, please see the web page <http://codes.ohio.gov> (search for Ohio Revised Code 6109.121).

## RULEMAKING ACTIVITIES

Below is a brief summary of recent and upcoming rule changes. For more details, including notice of opportunities to comment on draft rules, sign up for our electronic mailing list, or visit us on the web at [epa.ohio.gov/ddagw](http://epa.ohio.gov/ddagw).

### *Proposed Rules*

- Underground Injection Control, rules to be filed with minor amendments; effective fall 2016
- Contingency Plan Requirements for PWSs; tentative effective winter 2016

### *In the Works*

- Lead and Copper Rule Revisions, incorporating House Bill 512; interested party review (IPR) tentative 2016
- Operator Certification Amendments and New Rule; IPR, tentative winter 2016
- Capability Assurance Plans in Chapter 3745-87 and Yard Hydrants in Chapter 3745-95, no changes; IPR, tentative winter 2016

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