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Volume 3, Issue 2

Operational Monitoring and Monthly Operating Reports (MORs)

Public water systems must perform operational monitoring and report the information to Ohio EPA on a monthly basis. This information is used to ensure correct operation of public water systems and protection of public health.

Previously, this information was submitted to Ohio EPA on an assortment of five monthly operating reports (MORs) and two quarterly operating reports (QORs). With the introduction of the new electronic reporting system (eDWR), the reports have been consolidated to just two MORs.

Water Plant/Distribution System MOR (form 5002, rev. 09/10)
Communities, nontransient noncommunities that have treatment, and transient noncommunities that serve 1,000 or more people must submit this MOR.

A table describing minimum required operational analyses that should be performed (depending on the type of treatment provided) and reported on form 5002 is available at www.epa.ohio.gov/ddagw/reporting.aspx.

Surface Water Treatment Plant MOR (form 5109, rev. 09/10)
Public water systems that use surface water as their supply must submit this MOR.

Both MORs are due by the 10th day of the following month. Submission via eDWR (through the Internet) is the best way to report, although the option of submitting paper forms still exists for systems without a certified laboratory.

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2011 SPRING EXAM DATES & DEADLINES

Wastewater: May 10, 2011
(Application due Feb. 9,
2011)

Water: May 11, 2011
(Application due Feb. 10,
2011)

FOR MORE INFORMATION

Call the Operator
Certification hotline at
1-866-411-OPCT (6728) or
visit [www.epa.ohio.gov/
ddagw/opcert.aspx](http://www.epa.ohio.gov/ddagw/opcert.aspx)

THE COST OF FAILING TO RENEW YOUR CERTIFICATION

Applications for renewal of all operator certificates expiring on Dec. 31, 2010 were mailed during the last week of August, 2010. Renewal applications are due by **Nov. 30, 2010**.

If an operator allows his or her certificate to expire, Ohio EPA allows a one-year grace period after the renewal deadline for operators to renew their certificates without having to re-sit for examination. However, during this time, the expired certificate cannot be used. Additionally, operators with expired certificates may not be the operator of record for a facility.

Many operators are given additional compensation based on the level of certification they maintain. In recent years, due to economic concerns and other factors, utilities are more mindful of employees who are compensated for their certifications. Ohio EPA has encountered a number of utilities that are investigating employees with expired certificates. The results of these investigations have ranged from disciplinary actions, requests for repayment of compensation, theft charges and termination.

The lesson of this story is to renew on time and avoid the potentially costly implications associated with allowing your certificate to expire. In the event you are unable to renew on time, make your supervisors aware of the situation.

A list of operators whose certificates are expired and will become invalid on Dec. 31, 2010 is available at [www.epa.ohio.gov/portals/28/documents/
opcert/2009_expired_list.pdf](http://www.epa.ohio.gov/portals/28/documents/opcert/2009_expired_list.pdf).

CLOROX BLEACH NOW CERTIFIED BY WQA TO MEET NSF/ANSI STANDARD 60!

As a reminder, all chemicals, substances and materials added to or brought in contact with water in a public water system must be approved to NSF/ANSI standard 60 or 61.

NSF/ANSI standard 60 establishes minimum health effect requirements for chemicals, chemical contaminants, and impurities from drinking water treatment chemicals.

NSF/ANSI standard 61 establishes minimum requirements for the control of potential adverse human health effects from products that contact drinking water.

The Water Quality Association (WQA) has recently certified that **Clorox Regular Bleach** conforms to ANSI/NSF standard 60. For more information, visit the WQA website at www.wqa.org/goldseal/6.html. Important note: use only regular Clorox bleach; avoid any scented varieties!!

FREE OPERATOR CERTIFICATION EXAMS FOR SMALL WATER SYSTEM OPERATORS

In 2011, Ohio EPA will again be using a portion of its U.S. EPA expense reimbursement grant to offer **FREE** exams to operators taking the Class A, Class I and Class II Water Supply exams. Anyone with a high school diploma or equivalent may apply to take the above-referenced exams free of charge. Application and exam fees will both be waived. However, exam applications must be submitted by the posted application deadline. The purpose of the expense reimbursement grant is to assist in the training and certification of operators for small public water systems.

This offer for free exams does not apply to distribution, collection or wastewater treatment exams. To get an application, or for information about exam dates and deadlines, please visit the operator certification website at www.epa.ohio.gov/ddagw/opcert.aspx. More than 1,000 people took advantage of this offer in 2010!

SIGNIFICANT DEFICIENCIES — WHAT'S THE BIG DEAL?

Significant deficiencies are defects, failures or malfunctions in your water system that, if not corrected, can pose a risk to public health. This article provides an overview of significant deficiencies, and describes some new deadlines and consequences related to significant deficiencies under the Ground Water Rule.

What is a significant deficiency?

A significant deficiency is a defect that puts a public water system in violation of a drinking water requirement or that causes an unacceptable risk to the public's health. These can be any defect in the system's design, operation or administration, as well as any failure or malfunction of any system component that puts the system in violation. In addition, for the purposes of the Ground Water Rule, deficiencies can include defects the director determines to be causing, or have *potential for causing*, the introduction of contamination into the water delivered to customers.

Eeeek! It's a MOUSE!!



SIGNIFICANT DEFICIENCIES

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How will I know if I have a significant deficiency?

Significant deficiencies are usually identified during a routine sanitary survey or a limited scope site visit (LSSV). During a sanitary survey, your Ohio EPA inspector will look at the following eight components of your system to determine if any deficiencies exist.

- Source
- Treatment
- Distribution system
- Finished water storage
- Pumps, pump facilities and controls
- Monitoring, reporting and data verification
- Systems management and operation
- Operator compliance



If the inspector observes deficiencies, they will notify you in writing of their findings. Any significant deficiencies will be included in the “requirements” section of your sanitary survey letter or LSSV report, and will include specific requirements for responding to the significant deficiency.

What am I required to do if I have a significant deficiency?

You must respond to the inspector in writing within **30 days** of receipt of the written notice of the significant deficiency. Your written response should acknowledge the deficiencies and include a corrective action plan with a timeline for correcting the deficiencies. Ground water systems will also be required to prepare a special notice to their consumers about the significant deficiencies.

What is an acceptable schedule for correcting significant deficiencies?

Ground water systems must correct significant deficiencies within **120 days**, or earlier if required, of receiving written notification of the significant deficiency. For surface water systems, Ohio EPA will designate an acceptable corrective action schedule in the notification letter.

What happens if I don't correct the significant deficiency on schedule?

Ground water systems that fail to correct significant deficiencies on schedule will receive a treatment technique violation which would require a Tier 2 public notification. Community ground water systems must also include information about any significant deficiencies that remain uncorrected in their next Consumer Confidence Report (CCR).

Surface water systems that fail to correct a significant deficiency in accordance with their schedule will be addressed through the traditional enforcement prioritization process.

Where can I get more information?

Contact your Ohio EPA district office representative or visit our website at www.epa.ohio.gov/ddagw.

LEARN FROM EACH OTHER: CONSIDER THE POTENTIAL IMPACT OF PERSONNEL CHANGES

The Village of Noopaless recently decided to dismiss its operators of record. Between the time that the existing employees were dismissed and new employees hired, the system was without certified operators of record and in violation. Instead of moving on to other village business, administrators had to respond to notices of violation.

If you are considering a change in personnel, either hiring or dismissing employees, remember that any change in your system must be taken in full understanding of the

consequences and Ohio EPA regulations.

With this understanding, be sure to plan carefully to ensure you can continue to meet all requirements after the change.

If you're not sure about a requirement, please contact your district office inspector. We'd much rather help your system stay in compliance than send a violation letter!!

Have a hard-learned lesson you would like to share with others? Submit it to Holly Kaloz at holly.kaloz@epa.state.oh.us.

RULE-MAKING ACTIVITIES

Below is a brief summary of recent and upcoming 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 www.epa.ohio.gov/ddagw.

Recently adopted

- Ground Water Rule (effective October 31, 2010)

In the works

- Underground Injection Control: allow minimal discharge of wastewater from drinking water treatment to Class V wells without a permit (draft November/December 2011)
- Miscellaneous rules: operational requirements; backflow prevention; possibly update references to more recent versions of NSF, ANSI and ASTM standards (draft May 2011)
- Operator Certification: minor revisions (draft August 2011)
- Capability Assurance Plans: incorporate any legislative changes; add requirement to develop water production projections every five years (draft October 2011)
- PWS Definition: clarify what constitutes a PWS and is therefore under Ohio EPA's jurisdiction (draft November 2011)



Answer Place

Have questions?
Need help?
Click here to visit
the Answer Place.

DEAR ANSWER PLACE:

Is a Class II Water Distribution Certificate equivalent to a Class III Water Supply Certificate?

- Waterlogged

DEAR WATERLOGGED:

No, these certifications are not equivalent. A water distribution certificate only authorizes operators to serve as an operator of record for a distribution system.

A water supply certificate authorizes operators to serve as the operator of record for a public water system, which could include the distribution system.

- Answer Place

HAVE A QUESTION FOR ANSWER PLACE?

Ask a question at <http://ohioepa.custhelp.com>.

OHIO EPA'S SPIGOT NEWS

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OPERATIONAL MONITORING

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It is very important to review the new forms to be sure all of the required data is being reported correctly. Detailed instructions are available for both MORs identifying how the data is to be reported, such as the number of decimal places, how to round data, which sample to report if multiple samples are taken, which compound to report, etc. The instructions also provide some compliance determination criteria, as well as how to interpret and react to iron/manganese quality control check samples. The MORs, instructions, table of operational monitoring requirements and information about eDWR are available at www.epa.ohio.gov/ddagw/reporting.aspx.

Tip: Proper reporting of chlorine residuals

Chlorine residual analysis (total chlorine) performed at the same time total coliform (TC) samples are collected is now reported on the Water Plant/ Distribution MOR. Report the number of TC samples each month and the average total chlorine value for the month. *Note: you must still submit the Chlorine QOR (5114) if submitting "paper" copies of 5002.*

For the daily chlorine residual, report the lowest residual for each day. If TC samples were collected on that day, and analysis beyond total chlorine was performed (free and combined residuals are known), then

those data should be considered when determining which residual was lowest that day. Also, paired free and combined residuals must not be separated when reporting the lowest data on the MOR. For water systems using free chlorine in their distribution system, report the lowest free chlorine residual and the combined chlorine associated (paired) with the lowest free chlorine. When chloramines are used, report the lowest combined chlorine residual and the free chlorine associated (paired) with the lowest combined chlorine.

Avg. chlorine residual taken as same time as TC samples for QOR

Chlorine QOR Data					
Chlorine Residual (Total)					
# of Samples		Avg. Value(mg/L)			
(aa)		(bb)			
		Lowest		Chlorine	
Chlorine Residual (Free) (mg/L)		Chlorine Residual (Combined) (mg/L)		Chlorite	Type
(y)		(z)		Chlorine Dioxide	Routine
					Follow-Up
				(cc)	(dd)
				(ee)	(ff)

Daily chlorine residual

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