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Investigations Based on Revised Total Coliform Rule (RTCR)

The Revised Total Coliform Rule (RTCR), issued by U.S. EPA in 2014, changed the monitoring requirements for total coliform bacteria and the way that public water systems (PWSs) must respond when samples show that repeated total coliform bacteria (TC) and/or E. coli bacteria are detected. Ohio EPA adopted the new requirements, which went into effect on April 1, 2016. In accordance with the new rule, many small PWSs have received a level one or level two assessment (assessment) site visit with an Ohio EPA inspector. These site visits are field investigations to determine a possible cause of TC bacteria. Most of the assessments are done at small, non-community systems that serve less than 1,001 individuals.

Such systems generally consist of a well, a pressure tank and often no treatment. Some of the common questions we are receiving about this new rule are: How should small transient and non-community PWS plan for the site visit with an inspector? and What are some basic things that field inspectors have cited as a possible cause for the TC bacteria?

Once an assessment is triggered, a PWS should, at a minimum, visually inspect the entire system and attempt to identify areas of concern. The best way for each PWS to prepare for the assessment site visit is to download the assessment form, available at epa.ohio.gov/ddagw/rtrcr.aspx#175645033-noncommunity-systems-serving-1001, and be prepared to answer the questions.

Continued on page 2

INSIDE THIS ISSUE

Investigations Based on Revised Total Coliform Rule (RTCR).....	1, 2
Dear Answer Place.....	2
Tips for Writing Your 2017 CCR.....	3, 4
Asset Management is a Requirement, Now What?.....	4
Exam Info, 2018.....	5
The Fourth Cycle of the Unregulated Contaminant Monitoring Rule.....	5
Rulemaking Activities.....	6
Receive the Spigot News and More.....	6



Some of the most common issues cited following an assessment are:

- Well cap or conduit is not completely secured.
- Inadequate or no disinfection performed after depressurizations or maintenance.
- Cross connections – drain lines not air gapped.
- Water is pooling around the well casing.
- Incorrect sampling procedure – (for example, using dirty gloves, tap disinfection).
- Inadequate sample station/location – (for example, swivel taps, aerator not removed).
- Ion exchange softener malfunction or dirty brine tank.
- Illegal casing extension.
- Depression around the well.
- Well casing damaged by equipment (for example, mower, backhoe, etc.).
- Weather issues (for example, lightning strike at the well or flooding, etc.).
- Bacterial growth in pressure tank.
- Well and equipment located in a pit (below grade).

PWSs should watch for these issues when preparing for an assessment or completing a level one assessment form.

It is possible that an assessment may not provide a conclusive answer as to why TC bacteria are detected in the water. In such a case, the PWS should disinfect the system. Please work with your district inspector for the proper disinfection procedure. Disinfection references, along with more information, are included on the **RTCR website**.



DEAR ANSWER PLACE:

I'm on triennial lead and copper monitoring. Will my monitoring period change once the proposed revisions to Ohio's Lead and Copper rules become effective?

Answer Place

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

- Operator Ashley

DEAR OPERATOR ASHLEY:

It depends. It is possible the technicalities and specifics could change until the rule is final, but when the proposed lead and copper rules become effective, those on triennial monitoring will need to give Ohio EPA documentation of one of the following to remain on triennial monitoring:

- The 90th percentile for lead and copper has been ≤ 0.005 and 0.65 mg/L, respectively during the last five consecutive monitoring periods.
- The range of approved optimal water quality parameters approved has been maintained during the last five consecutive monitoring periods.
- The water system does not own lead service lines, fixtures, pipe or solder that contain lead.

If a PWS doesn't apply and receive confirmation that they can continue on triennial monitoring, they will be required to conduct annual monitoring.

- Answer Place

HAVE A QUESTION FOR ANSWER PLACE?

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

TIPS FOR WRITING YOUR 2017 CCR

Consumer Confidence Reports (CCR) became a requirement for all community public water systems (PWSs) as a part of the 1996 Amendments to the Safe Drinking Water Act (SDWA). The main goal of this piece of legislation was to promote the public right-to-know.

Since then, there have been many rule changes, both at the state and federal level, that have impacted the way information is communicated to consumers within the CCR. Because of the vast amount of information that must be included in the CCR, it is easy for some of it to get overlooked. Included in this article are reminders of mandatory language, data that must be included in your table of detected contaminants, and helpful links for writing your CCR. Ohio EPA provides a wide variety of CCR guidance material, all of which can be found online on Ohio EPA's [CCR homepage](#)¹.

Several requirements are commonly missed:

Mandatory language is language that must be in the CCR exactly word for word. Mandatory language that is often overlooked includes Source Water Assessment Plan (SWAP) information, public participation information, mandatory turbidity language (for surface water and purchased surface water systems only), and the status of your license to operate. All mandatory language and examples of how to include all this information can be found in the Ohio EPA [CCR template](#)².

SWAP language from the susceptibility analysis paragraph must be included. Specifically, the level (low, moderate, high) of susceptibility to contamination of your source water and the reasons for this determination are required. If you do not have your SWAP, you can look it up on Ohio EPA's [interactive SWAP map](#)³. Type your PWS ID, name or address in the search bar in the top, left-hand corner of the map and hit the search button. This will open a little window where you can find the Link to Report. Within the report you can find the required text for your PWS under the section titled Susceptibility Analysis.

Public Participation and contact information are separate requirements. Many systems that do not have regular meetings do not realize they must still describe to their consumers how to participate. If meetings will be held only if water issues arise, systems can say "While we do not hold regular meetings, should the need arise customers will be notified for participation" or, if no meetings will ever be held, you can write "To participate, or for more information, contact _____" if that is the only way for water customers to participate.

The table of detected contaminants is another section of the CCR that often proves difficult. You can find instructions on what to include and how to perform the appropriate calculations in Ohio EPA's [CCR Instructions](#)⁴. To look for specific contaminant instructions, use Ctrl+f while viewing the instructions to open a search bar and type in the contaminant name. Tables should include detections from the most recent samples obtained for the PWS. Contaminants that are sampled less than annually and detected should remain in the CCR until a new sample is taken and then updated to reflect the new results. Special attention should be given to how lead and copper is reported in compliance with the new statutory lead and copper requirements of 6109.121(C)(2)(b). You can find an example of everything that needs to be included in the [CCR template](#)².

Continued on page 4

Ohio EPA Spigot News ~ Small Systems Corner

TIPS FOR WRITING YOUR 2017 CCR...

Continued from page 3

If your **PWS has a population of less than 500**, your complete table is available at the bottom of the **CCR homepage**¹. Select the district your PWS is in and scroll through the list, which is in numerical order by PWS ID, or use Ctrl+f to open a search bar to find your table. Tables may be copied and pasted into the CCR.

CCRs do not need to be a complicated process. Visit Ohio EPA's website devoted to CCR guidance and preparation and take advantage of the available resources, including: tables for systems with populations of less than 500; updated templates and certification forms; instructions; and links to programs like CCR iWriter to help you make a CCR that not only meets the requirements but is easily readable for your consumers.

¹ epa.ohio.gov/ddagw/pws.aspx#113432740-consumer-confidence-reports

² epa.ohio.gov/portals/28/documents/ccr/CCRtemplate2016.pdf

³ <https://oepa.maps.arcgis.com/apps/webappviewer/index.html?id=38d04980a40d41f59d832a50f3fc0b92>

⁴ epa.ohio.gov/portals/28/documents/ccr/CCR_Instructions_Template_2016.pdf

ASSET MANAGEMENT IS A REQUIREMENT, NOW WHAT?

Recently, Governor Kasich signed Senate Bill 2 into law. With its passage, all public water systems are required to have an asset management program. While the requirements of an asset management program have been discussed in previous publications, each water system's program will be suited to their individual needs. The first step in creating a program is to understand what an asset management program is and what it can do for you.

Ohio EPA's Public Water Systems website has a variety of resources available on the Public Water Systems webpage under the **Asset Management tab**¹ to help you get started. The webpage will be updated periodically as new information becomes available. Other resources can be found through **the Ohio Rural Community Assistance Program (RCAP)**², **U.S. EPA**³, the **Environmental Finance Network**⁴ and **AWWA**⁵.

To help water systems implement these requirements, Ohio EPA is offering Asset Management Planning loans. Nominations for these loans will be accepted at any time. The loan terms will be five years at zero percent interest, with up to \$10,000 of principal forgiveness. More information can be found at: epa.ohio.gov/ddagw/financialassistance.aspx. For questions or more information, please email Susan Schell (susan.schell@epa.ohio.gov) or Emily Pohlmeier (emily.pohlmeier@epa.ohio.gov) or call (614) 644-2752. Stay tuned for periodic updates and training opportunities as they become available.

¹ epa.ohio.gov/ddagw/pws.aspx#1790210209-resources

² ohrcap.org

³ epa.gov/sustainable-water-infrastructure/asset-management-water-and-wastewater-utilities

⁴ efcnetwork.org/

⁵ awwa.org/



2018 PAPER AND PENCIL EXAMS WATER AND WASTEWATER

SPRING
Application Due: Feb. 8
Exam Date: May 9

FALL
Application Due: Aug. 9
Exam Date: Nov. 7

For More Information:

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



THE FOURTH CYCLE OF THE UNREGULATED CONTAMINANT MONITORING RULES

The 1996 Safe Drinking Water Act (SDWA) Amendments require that, once every five years, U.S. EPA issue a new list of no more than 30 unregulated contaminants to be monitored by public water systems (PWSs). The fourth Unregulated Contaminant Monitoring Rule (UCMR4) was published in the Federal Register on Dec. 20, 2016. This cycle of UCMR will run from 2017 to 2021 with monitoring occurring in 2018-2020¹.

All systems with a population greater than 10,000 must conduct UCMR4 monitoring, and U.S. EPA has randomly selected 1,600 systems with a population less than 10,000 to monitor as well. U.S. EPA pays for all analytical costs associated with UCMR4 monitoring. Great Lakes Environmental Center should have contacted these systems to complete inventory assessments and coordinate monitoring. Large systems must monitor and fund the analytical costs themselves. These systems can access their monitoring schedule and inventory lists through the **Central Data Exchange (CDX)**². To generate a full schedule, the PWS must upload inventory data into CDX. Systems on reduced monitoring for disinfection byproducts should only enter data for the sites used on their current reduced monitoring schedule. Monitoring will begin in 2018 so PWSs are urged to log into CDX to verify monitoring schedules and upload inventory before Dec. 29, 2017.

As this is the beginning of a new cycle of UCMR4, PWSs selected for monitoring should familiarize themselves with UCMR4 contaminants, their sample schedules, and verify their inventory data to assure correct sample locations are utilized. More information about UCMR4 can be found on U.S. EPA's **webpage**³. Systems may also contact Great Lake Environmental Center's UCMR message center at 1-800-949-1581 with questions. General questions about UCMR4 in can also be directed to Ohio EPA's Emilie Eskridge by email (Emilie.Eskridge@epa.ohio.gov) or phone at (614) 644-2752.

¹Fourth Unregulated Contaminant Monitoring Rule. (2017, July 11). Retrieved September 15, 2017, from epa.gov/dwucmr/fourth-unregulated-contaminant-monitoring-rule

² cdx.epa.gov/

³ epa.gov/dwucmr/fourth-unregulated-contaminant-monitoring-rule

EPA United States Environmental Protection Agency

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Welcome

Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

OHIO EPA'S SPIGOT NEWS

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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.

Recently Adopted

- Iron and Manganese Treatment, Minor Revisions (effective Oct. 14, 2016)
- Underground Injection Control, Minor Revisions (effective Nov. 11, 2016)
- Contingency Plan Requirements for PWSs (effective Dec. 23, 2016)

Joint Committee on Agency Rule Review (JCARR)

- Lead and Copper Rule Revisions, incorporating House Bill 512; tentative filing November 2017

Interested Party Review (IPR)

- Disruption of Service; tentative start November 2017
- Asset Management, incorporating Senate Bill 2; Tentative start November 2017
- UIC, No Change; Tentative Start November 1, 2017

RECEIVE THE *SPIGOT NEWS* AND MORE

The Spigot News is sent only to subscribers! Sign up to receive it in electronic form at <http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage>. On this webpage, you can also subscribe to our free electronic mailing service for quick and timely updates on several other topics, including:

- Resiliency and Water Security: Emergency Management Information for Public Works
- Harmful Algal Blooms Mailing List: Updates for Public Water Systems and Laboratories
- DDAGW Spigot News: Newsletter for Public Drinking Water Systems
- Drinking Water: Rulemaking Activity and Policy Notification
- Monitoring and Compliance Information
- Underground Injection Control: Rulemaking Activity and Program Notification
- Operator Certification Program: Drinking Water and Wastewater
- Electronic Reporting: Lab Reporting or Water System Reporting