

Capability Assurance for WSRLA Applicants

A capability assurance plan (CAP) ensures that a public water system (PWS) acquires and maintains adequate technical, managerial and financial capability to ensure that a PWS has long-term viability and provides safe drinking water to the public. In Ohio, a CAP is required for any new community or non-transient non-community water system, or if an existing PWS is seeking funding through the Water Supply Revolving Loan Account (WSRLA).

A WSRLA loan may provide financial assistance for the planning, design and construction of improvements to community water systems and non-profit, non-community public water systems. If applying for WSRLA funding, the PWS must complete a CAP and include technical, managerial and financial plans. Below is an overview of each plan and the items that must be submitted when applying for WSRLA funds.

Technical Plan

The plan must explain why the proposed project is needed and provide justification for the particular project compared to the needs of the rest of the water system.

Technical plan requirements for a construction loan:

- detail plan submittal information or an approval letter; or
- date when plans are expected to be submitted.

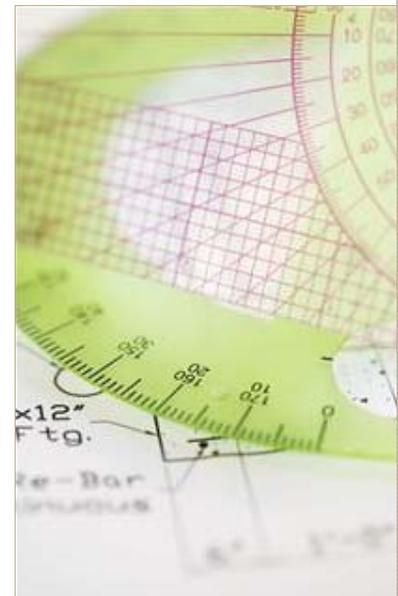
Technical plan requirements for a design loan:

- copy of engineering contract; and
- expected date of detail plan submittal.

Technical plan requirements for waterline extensions and/or replacements:

- expected number of new customers on the waterline;
- actual number of signed agreements received, including information about tap-in fees collected

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DOCUMENTING TIME IN OPERATION RECORDS

Ohio Administrative Code (OAC) rule 3745-7-09(A) requires the owner and operator of record (ORC) to document a number of items in their operation and maintenance records. One of those items is documentation of the arrival and departure times for the ORC and any other operator required by Chapter 3745-7. This would include back-up operators and operators who are being used to justify a reduction in the minimum staffing requirement. Ohio EPA recommends that all operators at a public water system, distribution system, sewerage system or treatment works document their arrival and departure times. When recording arrival and departure times:

- accurately record exact arrival and departure times;
- record exact times and do not round;
- separate staffing is required for water and wastewater times – do not overlap;
- ORCs for multiple facilities need to ensure that the arrival and departure times are being accurately recorded at each facility; and
- travel time is extra - do not record travel time between facilities as part of the arrival and departure times.

ORCs should ensure that the minimum staffing requirements are being met in accordance with OAC rule 3745-7-03.

Please also keep in mind that, on many occasions, an operator may need to spend more time per day or week than is required in order to maintain compliance and public health and safety standards at a PWS, especially during emergencies. When an ORC or operator fails to do this, or to follow the above-listed procedures, disciplinary actions may be taken on the operator's certificate(s), including revocation.

If you have any questions related to the record keeping requirements, feel free to contact Ohio EPA's Operator Certification Unit at 1-866-411-OPCT (6728) or (614) 644-2752.



OHIO EPA'S 2014 FALL EXAM DEADLINES AND DATES

Wastewater:

Application due Aug. 7, 2014
Exam - Nov. 5, 2014

Water:

Application due Aug. 8, 2014
Exam - Nov. 6, 2014

Class A Water/Wastewater:

Application due
June 26, 2014
Exam - Sept. 24, 2014

FOR MORE INFORMATION

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

Applications are available online at epa.ohio.gov/ddagw/opcert.aspx#LiveTabsContent111260

APPROVED EXAMINATION PROVIDERS

Schedule an examination through ABC's Ohio Certification website at www.abccert.org/Ohio_EPA/certification_process.asp



PROTECTING YOUR PUBLIC WATER SYSTEM WELL

A well-protected source for your public water system (PWS) is the first step to ensure you are providing the safest water possible to your customers. A well that is protected from chemical or biological contamination and physical damage will also keep your PWS from incurring added sampling, treatment and well replacement costs in the future.

There are steps you can take to help ensure that the well(s) that make up your PWS are protected and capable of providing the safest water possible to consumers. Below are a few questions and answers to assist in determining if there is anything you can do to protect the well(s) currently serving your water system.

Q: I've been told I must maintain a sanitary isolation radius around my well. What does this mean?

A: A sanitary isolation radius is the minimum distance around a well that must be protected from potential or known sources of contamination. The PWS should own the property containing the sanitary isolation radius.

Q: What are some examples of sources of contamination that could affect my well?

A: Some of the most common sources of contamination that could affect a well include: sewer lines; fertilizer, herbicide and pesticide application; chemical storage; fuel tanks; and garbage dumpsters. All existing or potential sources of contamination should be removed from the well's required sanitary isolation radius.

Q: What is the minimum required sanitary isolation radius for a well?

A: The minimum sanitary isolation radius depends on the amount of water used by the individual PWS. A large user may be required to maintain an isolation radius of 300 feet around each well; for a small water system, as little as 50 feet may be required. To determine the required isolation radius for your water system, please contact your Ohio EPA district representative or refer to Ohio Administrative Code (OAC) rule 3745-9-04. Ohio EPA district office contact information can be found at epa.ohio.gov/districts.aspx. Drinking water rules are available online at epa.ohio.gov/ddagw/rules.aspx.

Q: What should I do if there are permanent sources of contamination within my sanitary isolation radius that can't be removed?

A: Every effort should be made to remove sources of contamination within the sanitary isolation

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PROTECTING YOUR PWS WELL

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radius. If it is not possible to do so, you should contact your Ohio EPA district representative to determine if there are other methods to help protect the current water source or to develop a plan for another source should there be problems with the well(s).

Q: What should I do if I don't own all or part of the sanitary isolation radius?

A: If ownership of the entire sanitary isolation radius is not possible, you should obtain a lease or easement of the property to ensure you can control sources of contamination.

Q: What can I do to protect my well from physical damage?

A: Often, wells are located in or near parking areas, or in areas that make them susceptible to damage from tractors and mowers. It doesn't take a strong impact to crack a well casing or unseat it, both of which increase the chances of biological or chemical contamination. A simple method to protect a well from this type of damage and keep it accessible for maintenance is to surround it with strong posts called bollards, as shown in the pictures below.



Additionally, consider development and implementation of a Source Water Protection Plan. If you need assistance, contact your Ohio EPA district representative and they can put you in contact with the source water specialist for your area. You may also want to visit epa.ohio.gov/ddagw/swap.aspx for more information about developing a source water protection plan.

The requirements contained in this article are just a few things a PWS owner or operator should use to protect the drinking water source. Ohio EPA's well standards, found in OAC Chapter 3745-9, lay out specific standards for well construction and protection. Taking proactive steps to protect your PWS well, including the ones listed above, will provide you and your customers peace-in-mind knowing you have done what you can to help ensure that the drinking water source is safe now and into the future!

RULE-MAKING 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 at epa.ohio.gov/ddagw/rules.aspx.

Proposed Rules to Become Effective

- License to Operate PWSs: clarify requirements and remove redundant information (rule revisions to take effect in summer 2014)
- PWS Definition and Water Source Designation: clarify definition of a PWS and who is under Ohio EPA's jurisdiction; allow Ohio EPA to designate the majority of water sources by rule (rule revisions to take effect in summer 2014)

Upcoming Proposed Rules

- Underground Injection Control (UIC): reorganize rules, remove outdated information and clarify requirements (fall 2014)

Interested Party Review

- Water Well Standards and Plan Approval: several amendments and clarifications, and includes update to Guidelines for Design of Small Public Water Systems (summer 2014)
- Laboratory Certification: update rule-by-reference to lab manuals, revise interim authorization requirements (summer 2014)
- Operator Certification (amend rule 3745-7-02): changes will allow operator who passed Class I examination but does not have required experience to be the operator of record for certain Class I systems if specific conditions are met (summer 2014)
- Primary Drinking Water Standards and Plan Approval: two outdated rules will be rescinded and six rules will be revised with minor edits (summer 2014)
- Misc. Amendments: reference revised backflow prevention manual in rule, revise self-certification provisions, revise investigation of water use practices (second round of interested party review fall 2014)

In the Works

- Consecutive System, Operator Certification and Operational Requirements: revisions will clarify requirements for consecutive systems that install treatment; revise clarify classification of PWSs and require Class I operators for TNC systems serving <250 with 4-log disinfection or nitrate removal; and require noncommunity PWSs serving <1,000 that choose to chlorinate to meet minimum chlorine residual requirements.

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Subscribe for electronic notification to find out when rules and policy are available for review or are final at http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.



Answer Place

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

DEAR ANSWER PLACE:

When do the plumbing fixtures in a business have to comply with the lead reduction requirements?
- Lead Fittings

DEAR LEAD FITTINGS:

Existing plumbing fixtures should continue to be replaced as appropriate (for example, deterioration, pre-determined schedule, etc.). Fixture replacements must meet the new lead reduction requirements established by U.S. EPA. This information can be found at water.epa.gov/drink/info/lead/upload/epa815s13003.pdf.

- ANSWER PLACE

HAVE A QUESTION?
ohioepa.custhelp.com

OHIO EPA'S SPIGOT NEWS

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CAPABILITY ASSURANCE...

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or other financial commitments received; and,

- a statement concerning the status of any required easements

Technical plan requirements for water treatment plant or source upgrades or installations:

- a description of the alternatives, including the reasoning for the chosen option;
- monthly water loss calculations for the existing system for the past year; and,
- a five-year capital improvement plan, including a list of possible funding sources for future projects. If a system does not maintain a five-year improvement plan, a list of expected upcoming projects is acceptable.

Managerial Plan

This plan must include the system's operational procedures and a description of the modifications needed as a result of the proposed project, including:

- an updated contingency plan, if not submitted to Ohio EPA in the past 12 months;
- an organizational table for the system, including staff names and titles;
- ownership structure and operator licensing information (for private water systems only);
- a description of the backflow prevention program (if this program is not fully implemented, a compliance schedule must be included); and,
- a copy of any intergovernmental agreements which are part of the proposed project.

Financial plan

This plan must describe the PWS's current and projected revenues, cash flow for meeting the annual costs and long-term liabilities for at least five years. In addition, the plan must describe the available financial resources to help ensure ongoing water supply system viability.

Currently, Ohio EPA only requires CAPs for new PWSs and those systems applying for WSRLA funds. To help ensure PWS capability, Ohio EPA is working to increase the scope of the Capability Assurance Program to establish a process to continually assess all PWSs.

For a detailed discussion of CAP requirements, please see the Capability Assurance Guidance available at epa.ohio.gov/ddagw/financialassistance.aspx or contact Ohio EPA's Division of Drinking and Ground Waters at (614) 644-2752.

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