

Winter 2014
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Preparing to Respond to Emergencies

Is your public water system (PWS) prepared to respond to emergency situations? A contingency plan will describe who does what during an emergency, when they do it and with what resources. Preparing a plan can seem daunting, but once complete, is effective and may help limit disruption of service to customers.

Ohio EPA requires community PWSs to develop and maintain contingency plans. Noncommunity PWSs are encouraged to do the same. The requirement for these plans and their content, such as the items below, is found in rule 3745-85-01 of the Ohio Administrative Code.

- Map of the distribution system.
- Backup power/generator information.
- Emergency notification methods.
- 24-hour telephone numbers (for example, hospitals, consecutive systems, Ohio EPA, certified laboratory, Ohio WARN). Ohio EPA's 24-hour telephone number must be used after 5:00 p.m. or on holidays and weekends to notify the Agency of emergencies.
- Information about alternate water sources.
- Information about budgets for emergency use.
- Water users with critical needs for a continuous supply of water.

It is important for systems to inventory and characterize water system components for failures that might incapacitate the system. Components include the source of water, low- and high-service pumps, treatment facilities, transmission and distribution lines, storage facilities, water system personnel, records and indirect components (for example, electric power and communications). Valve locations, spare parts and storage capacity should also be identified.

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**2015 SPRING PAPER
AND PENCIL EXAM
DEADLINES AND DATES**

Wastewater:

Feb. 4- Application due

May 5 - Exam

Water:

Feb. 5 -Application due

May 6 - Exam



**FOR MORE
INFORMATION**

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)

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INTRODUCING HIGH SCHOOL STUDENTS TO WATER AND WASTEWATER OPERATOR CAREERS

Where will the next generation of water and wastewater operators emerge? Would you be willing to talk to students at a local school about your career? Would your facility be willing to host a field trip, or let a high school or college student shadow you for a day? Most high school students, and even teachers and career counselors, have little understanding of the wide variety of things environmental professionals do, or the training and skills required.

Ohio EPA has been working with the Ohio State University (OSU) and the Environmental Education Council of Ohio (EECO) to recruit **environmental career ambassadors** who would be willing to talk one-on-one with students about their careers, make an occasional classroom presentation or participate in local school career days. A brochure about the program is posted at <https://eeco.wildapricot.org/Resources/Documents/ECA%20brochure.pdf>. Do you have internships or shadowing opportunities for high school or college students? Could you help recruit other career ambassadors? Sign up through OSU's **Environmental Professionals Network (EPN)** at <http://epn.osu.edu>, and check any of the career ambassador options for which you feel you might be able to help. Teachers and career counselors will search the database by county to find local ambassadors, and contact you with an invitation to speak or participate in a career exploration day. You always have the opportunity to say 'no' to any request.

OSU's EPN is an online community connecting Ohio professionals in:

- air quality;
- environmental health and policy;
- energy, materials and sustainability;
- land use and conservation;
- water resources and water quality; and
- wildlife and ecosystems.

We encourage you to join EPN. Members share information, announce events and training opportunities, post/seek jobs, internships and volunteer opportunities, and find collaborators for projects. The network is not limited to OSU faculty and alumni.

If you are willing to take the next step and be a career ambassador, when you set up your EPN member profile, simply check any of the **Career Ambassador** activities with which you might want to be involved. Teachers and career counselors in your area may also contact you with a request to schedule a field trip, or other activities based on your level of interest and availability.

If you have questions or would like to help develop the ambassador network, please contact Carolyn Watkins, Chief of Ohio EPA's Office of Environmental Education, at Carolyn.Watkins@epa.ohio.gov.

IDENTIFY SIGNIFICANT DEFICIENCIES PRIOR TO A SANITARY SURVEY

Sanitary surveys are conducted every three years for community public water systems (PWSs) and every five years for noncommunity PWSs. During the years between surveys, issues can arise that threaten public health. Proactively reviewing specific elements in the system prior to a survey may identify potential issues before they become a significant deficiency. Any significant deficiencies identified during a sanitary survey inspection are recorded in the survey letter and must be corrected.

This article discusses significant deficiencies based on the Ground Water Rule and Surface Water Treatment Rule found in the OAC. Ohio EPA's Division of Drinking and Ground Waters (DDAGW) defined and is citing PWSs for these deficiencies due to their potential to cause a significant public health threat.

The major elements reviewed during a sanitary survey include: source; treatment; distribution system; finished water storage; pumps, pump facilities and controls; monitoring, reporting and data verification; water system management and operation; and operator compliance. Significant deficiencies can also be cited during a Limited Scope Site Visit (LSSV), such as the annual site visit conducted at surface water systems based on the same criteria used during a sanitary survey.

DDAGW identified questions which automatically trigger a significant deficiency and developed a risk assessment tool or hierarchy to help inspectors, water operators or owners assess the danger posed.

When it is unclear whether a deficiency is significant, this three-step risk assessment process can provide a progressive identification of the following three categories:

1. Likelihood of failure (High, Medium, Low);
2. Level of Contingency (Inadequate or Adequate); and
3. Impact of Failure (Significant or Insignificant).

If the assessment determines a significant impact, a potential significant deficiency will be presented to the management team. Upon determination of a significant deficiency, a letter is written and sent back to the PWS. The system has 30 days to respond with an agreeable plan and schedule to correct the deficiency.

Currently, ground water facilities have a 120-day window to correct the deficiency or propose an agreeable schedule. Surface water facilities must propose an acceptable schedule within 30 days, but do not have a specified timeframe to correct the issue. DDAGW is currently in the process of drafting rules to align the timeframes for all significant deficiencies.

Facilities may do their own internal assessments, using the three-part assessment presented above without the involvement of DDAGW. The internal determination to call a deficiency "significant" does not mean DDAGW must be notified and may allow systems to correct these deficiencies before the Agency cites them during a survey or LSSV.

COMMON CONSUMER CONFIDENCE REPORT (CCR) MISTAKES

Every year, the Division of Drinking and Ground Waters (DDAGW) reviews more than 1,000 Consumer Confidence Reports (CCRs). In general, the reports are well prepared, but quite a few water systems receive notices of violation for being late or for failure to include all required content. Below are five of the most common CCR deficiencies.

Reports and Certification Forms are Not Received at Ohio EPA by July 1

Mail your copy with plenty of time to arrive in Columbus before July 1. A copy of the CCR and a completed certification form must be received, not postmarked, by July 1 each year. DDAGW receives more than half of the CCRs during the last three days of June. It is especially important to send your information early if July 1 falls on a weekend or a Monday. If necessary, CCR documents may be submitted electronically by email to ***Kathy.Pinto@epa.ohio.gov***, or faxed to DDAGW at (614) 644-2909.

License to Operate (LTO) Status is Not Included

CCRs in Ohio must include a statement explaining the status of the water system's LTO (for example, unconditioned or conditioned LTO during licensing year) during the calendar year of the CCR. The statement is not automatically included in the report generated by U.S. EPA's CCRiWriter. If using CCRiWriter, be sure to add the LTO statement.

Violations are not Reported

All violations occurring in the CCR calendar year must be described in the report. For example, monitoring violations must include the dates of the sampling period missed, the contaminant not sampled and what the water system did to correct or not repeat the violation in the CCR. For MCL and action level exceedances, additional health effects language is required. A full description of all violations is expected.

Sometimes information describing a violation is included, but elsewhere in the document older language (from a previous CCR) stating that the system meets all standards or otherwise indicates "full compliance" and "no violations" is not updated or removed. Remember to update all references to compliance in the document.

Mandatory Lead Language is Missing

The inclusion of a paragraph with information about lead has been required for several years, and is needed regardless of the level of lead or copper found in testing. Mandatory language is required for every CCR.

Table of Detected Contaminants is Not Correct

Some of the more serious issues in the table are the inclusion of non-detected substances, failure to list how many lead or copper samples exceeded the action level, and failure to update the introductory statement about what type of sampling was done to match the information in the table for the current year.

For more information and forms, visit DDAGW's web page at ***epa.ohio.gov/ddagw/pws.aspx***, and click on the "Consumer Confidence Reports" tab.

Get Involved Early — Have a Say on Environmental Rules

Early stakeholder outreach is the first step in Ohio EPA's rule-making process. It allows you to provide feedback as early as possible when Ohio EPA needs to amend, rescind or create rules, whether due to changes to state or federal law or a routine five-year review.

Why comment so early in the process?

The early stakeholder outreach phase is the only opportunity to shape the direction of rules before staff begins drafting language.

By sharing your comments early in the process, Ohio EPA can consider different concepts and ensure our rule development takes into account the effects the rules will have.

Use these questions as a guide when you develop your early comments:

- Is the general regulatory framework proposed the most appropriate? Should Ohio EPA consider an alternative framework?
- What options are available for improving an identified concept?

- Are there considerations the Agency should take into account when developing a specific concept?
- Is there any information or data the Agency should be aware of when developing program concepts or rule language?

Ohio EPA also needs to know:

Would this regulatory program have a positive impact on your business or facility? Explain how.

Would this regulatory program have an adverse impact on your business or facility? Explain how.

There is not an official written response to input received during the early stakeholder outreach phase of rule development. However, your input is very important to Ohio EPA and it will be considered when rules are being drafted. There will be additional opportunities to comment on specific rule language later in the process.

Please sign up for rule notification emails.

ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage

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 on the web at ***epa.ohio.gov/ddagw***.

Recently adopted

- Operator Certification: revisions to rule 3745-7-02 (effective October 31, 2014)

Continued on page 6

Answer Place

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

DEAR ANSWER PLACE:

I heard all water systems are going to have new inspectors. Where can I find more information?

- H2O Operator

DEAR H2O OPERATOR:

DDAGW is implementing a plan to rotate staff facility assignments to ensure we are doing our job in a fair and responsible way, enhancing uniformity of our inspections and providing new perspectives and ideas. You can find out more information by contacting your District Office.

- Answer Place

HAVE A QUESTION FOR ANSWER PLACE?

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

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OHIO EPA'S SPIGOT NEWS

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Mary Taylor, Lt. Governor
Craig W. Butler, Director

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For emergencies occurring
after 5 p.m. or on a weekend
or holiday, please call Ohio
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PREPARING TO RESPOND...

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Remember that your contingency plan is not a static document – it should be reviewed and updated at least annually. Once updated, copies should be maintained at several accessible locations in your system (for example, water plant, sheriff's office, mayor's office), and sent to your local Ohio EPA District Office DDAGW representative and local Ohio Emergency Management Association (EMA) personnel.

For more details on what to include in a contingency plan, please visit the Resources tab at <http://epa.ohio.gov/ddagw/security.aspx> or contact your local district office representative.

RULE-MAKING ACTIVITIES

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Proposed

- Amendments to Primary Drinking Water Standards in Chapter 3745-81 and Plan Approval rule 3745-91-03 of the Administrative Code; adopt in late Jan. 2015

Interested Party Review

- No Changes to Primary Drinking Water Standards in Chapter 3745-81 of the Administrative Code; tentatively propose in Jan. 2015
- Water Well Standards in Chapter 3745-9 and Plan Approval rules in Chapter 3745-91 of the Administrative Code; tentatively propose in Jan. 2015
- Laboratory Certification rules in Chapter 3745-89 of the Administrative Code and Laboratory Manuals; tentatively proposed Dec. 2014
- Underground Injection Control amendments in Chapter 3745-34 of the Administrative Code; tentatively propose in Feb. 2015
- Backflow Prevention & Cross-Connection Control amendments in Chapter 3745-95 and additional rule amendments in Chapter 3745-91 and 3745-96 of the Administrative Code; tentatively start second round of interested party review in Dec. 2014

In The Works

- Interested Party Review for Revised Total Coliform Rule (RTCR); tentatively Jan. 2015
- Early Stakeholder Outreach for 2015-2017 DDAGW Rule-Making Plan; tentatively Dec. 2014. **For more information about Early Stakeholder Outreach, see page 5 of this newsletter.**

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Sign up to receive this newsletter at http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage.