

DDAGW Update

One Water Conference
March 7, 2019

Amy J. Klei, Chief
Division of Drinking and Ground Waters

Overview

- Program Update
 - Lead and Copper
 - Disruption of Service
 - Asset Management
 - Operator Certification
 - Other items
- Emerging Contaminants
- USEPA Legislation - AWIA
- Future Priorities

Lead and Copper

- Reorganizing website
- Developing Optimal Corrosion Control Team
- Guidance: *Water Line Repairs and Replacements in Areas with Lead Service Lines*

Guideline for Water Line Repairs and Replacements in Areas with Lead Service Lines

- For types 2, 3 and 4 the rule addresses repairs and replacements in areas with known or likely to contain lead service line
- Agency worked with a sub-group of Ohio AWWA on guidance (PWS-06-001)
- Focuses on simultaneous compliance with notification requirements of the Disruption of Service and Lead & Copper rules



Guidelines for Water Line Repairs and Replacements in Areas with Lead Service Lines

PWS-06-001
Division of Drinking and Ground Waters
Issued: November 1, 2018



Lead and Copper Treatment Unit Filter Requirements

- Must offer filters for main replacements in the areas of lead service lines or on partial lead service line replacements is effective on 10/1/18.
- If you do full LSL replacement, no filters are required.
- Keep good records – need them for maps and future lead monitoring and filter provision requirements.

Lead and Copper – WIIN Act

- Water Infrastructure Improvements for the Nation Act (WIIN Act) Grant Programs:
 - Addresses, supports and improves America's drinking water infrastructure.
 - Includes three new drinking water grants that promote public health and the protection of the environment
 - The budget for Fiscal Year 2018 includes appropriations in the Congressional Budget.

Lead and Copper – WIIN Act

- WIIN Act – Section 2107: Lead Testing in School and Child Care Program Drinking Water
 - USEPA allocated \$20 million dollars for testing only for lead in schools and daycares
 - Non-competitive grant
 - ODH taking the lead
 - Focusing on day cares since Ohio had the School Lead Fixture grant program during the last 2 years.
 - All 50 states applied
 - State allocations March 11, 2019
 - May 20, 2019 State Workplans due

Disruption of Service Rules

- Effective 11/1/18; Defined into 4 types
- Use of the tool is required for Type 3 and 4 disruptions.
- Type 1 and 2 can also be reported using the online tool but not required.
- The number of after hours calls has reduced.
- The online reporting tool has been modified for **After Action Reporting**.

Disruption of Service Rules

- Type 3 and 4 require:
 - Issuance of a boil advisory
 - Chlorine and bacteria testing after fixing the issue
 - Disruptions impacting > 100 service connections or 10% of the customers whichever is least must be reported to the agency by phone
 - All Type 3 or 4 disruptions require the submission of an after action report using the online reporting tool

DOS Reminders

- Type 1 and 2 do not require:
 - Reporting to Ohio EPA
 - A boil advisory; or
 - Total coliform sampling
- Provide notification if in an area of know or suspected lead service lines
- Understand the difference between a repair and replacement

Asset Management Rules

- PWS are NOT required nor requested to submit the written documentation of their asset management programs to Ohio EPA, except for the following:
 - Systems under enforcement, systems with obvious capability issues, or systems requesting SRF loans
- These systems will undergo a capability screening to identify areas of deficiency
- The systems' asset management program will need to address these areas
- Look for upcoming continuing education webinars on specific areas of asset management.

Asset Management Implementation

- Do NOT submit written documentation of your asset management program to Ohio EPA unless requested but maintain onsite
- Make sure your contingency plans and valve exercising programs are documented and up to date
- Sanitary survey questions added
- Capability screening is initial AMP review tool

Implementation Tools

- Guidance available for small systems, larger system guidance will be released soon, expectations will vary based on system type and complexity
- Templates available for very small systems
- Asset Management Webpage:
<http://epa.ohio.gov/ddagw/pws.aspx#113435168-asset-management>

Funding for Asset Management

- Planning loans are available
 - Terms of 5 years at 0% interest
 - Application accepted at any time



Operator Certification

- Rules effective 8/15/18
- All certified operators referred to as Professional Operators.
- Changes to operating experience definition effective 08/15/19
- Contract Operators must apply for approval prior to acting as an ORC
- Minimum staffing requirements for both collection and distribution systems
 - Class 1 (3 visits per week)
 - Class 2 (5 visits per week)
- Applicants for exams, certification and renewal must complete Ohio EPA Operator Training Course

Operator Certification

- Time in and Time out must be recorded in military time
- Minimum staffing must be reported on eDWR or eDMR
- Renewals must be submitted electronically
- Renewals due by November 30th of renewal year
- Renewal grace period reduced to 6 months
- Training providers required to upload attendance to e-business center
- New contract operator rule with specific requirements for contract operators and contract operation companies

2018 Operator Workforce Summit

- Summit convened in September 2018
 - Identified existing opportunities to assist in obtaining or developing certified operators
 - Identified ideas for:
 - Marketing the profession
 - Educational opportunities
 - Succession planning
 - Training
 - Shared services
 - Final Report under career information tab on Opcert Website

Other Rule Updates

- Manganese: Planning second round of ESO
- Disinfection byproducts: Completed second round of ESO
- SWTR update: Completed interested party review
- Lab Reporting:
 - Effective 5/1/18; new reporting requirements 10/1/18
 - Large number of labs missed reporting requirement
 - Other rule changes for Laboratory Certification under review; changes to reflect federal process

Consumer Confidence Reports

- DDAGW has lots of resources available on our CCR web page to help PWS comply:
- <https://www.epa.state.oh.us/ddagw/pws#113432740-consumer-confidence-reports>
- Tools were added for calculating contaminant levels for the table on our website
- Detections found during the 2018 UCMR sampling should be listed in a separate table in the CCR
- DDAGW CCR staff will provide draft reviews of CCRs if the drafts are submitted no later than May 15th. Draft CCRs can be submitted at CCR@epa.ohio.gov.

General Permit for Beneficial Use of Water Treatment Plant Residuals

Ohio EPA Division of Materials Waste Management:

- General Permit released late 2018
- Guidance available within next few weeks

Ohio Board of Higher Education HAB Grant:

- Further evaluate extraction and analytical methods for determining concentrations of microcystins in WTR
- Determine fate of microcystins in WTR.
- Evaluate potential for plant uptake

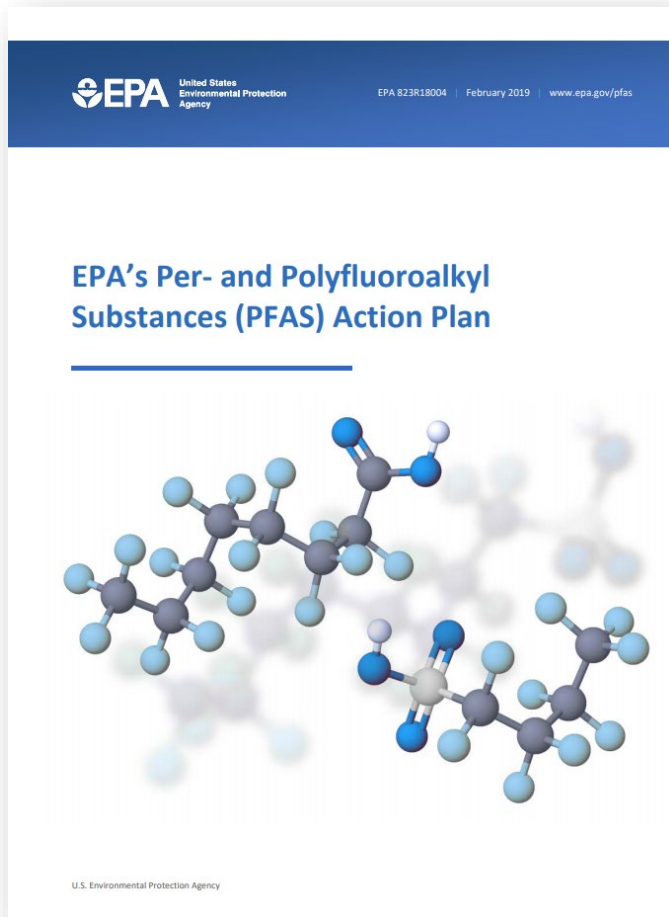


Emerging Contaminants

- Knowns and unknowns
 - HABs, *Legionella*
 - Per- and Polyfluoroalkyl Substances (PFAS)
 - Pharmaceuticals, microplastics, etc.
- Public interest and expectations have changed
- Drinking water on the front line



New Developments – February 2019



- Released 2/14/19
- Develop drinking water standard
- Designate PFOA/PFOS as hazardous substances
- Develop interim ground water clean-up recommendations
- Toxicity levels determined for GenX and PFBS

U.S. EPA Action Plan

- **Drinking water:** EPA is moving forward with the [MCL process](#) outlined in the Safe Drinking Water Act for PFOA and PFOS—two of the most well-known and prevalent PFAS chemicals
- By the end of this year, EPA will propose a regulatory determination, which is the next step in the Safe Drinking Water Act process for establishing an MCL
- Continue to use enforcement tools and assist states
- Develop risk communication toolbox

U.S. EPA Action Plan

- **Clean up:** EPA has already begun the regulatory development process for **listing PFOA and PFOS as hazardous substances** and will **issue interim groundwater cleanup recommendations for sites contaminated with PFOA and PFOS**. This important work will provide additional tools to help states and communities address existing contamination and enhance the ability to hold responsible parties accountable.

U.S. EPA Action Plan

- **Enforcement:** EPA will use available enforcement tools to address PFAS exposure in the environment and **assist states in enforcement activities.**
- **Monitoring:** EPA will propose to include PFAS in nationwide drinking water monitoring under the next Unregulated Contaminant Monitoring Program. The agency will also **consider PFAS chemicals for listing in the Toxics Release Inventory** to help the agency identify where these chemicals are being released.

U.S. EPA Action Plan

- **Research:** EPA will **develop new analytical methods** so that more PFAS chemicals can be detected in drinking water, in soil, and in groundwater. These efforts will improve our ability to monitor and assess potential risks. EPA's research efforts also include developing new technologies and treatment options to remove PFAS from drinking water at contaminated sites.

PFAS Response in Ohio

- Initial efforts focused on protecting drinking water
- Coordinating with U.S. EPA and stakeholder groups on national policy
- Communicating with researchers for method development, treatment technologies and best management practices
- Ohio EPA's laboratory can now provide PFAS analysis

UCMR 4

(Unregulated Contaminant Monitoring Rule – 4th round)

- Monitoring began 2018; Ends 2020
- All PWS >10,000; 1600 randomly selected PWS <10,000
- Monitoring Schedules in USEPA's Central Data Exchange (CDX): 10 cyanotoxins and 20 other
- epa.gov/dmucmr/fourth-unregulated-contaminant-monitoring-rule

AWIA (U.S. EPA Legislation)

- These are all federal requirements that US EPA will implement. Timeframe unknown.
- CCRs
 - electronic delivery,
 - 2x/yr for facilities serving >10,000
 - Possible changes to report
 - Info on corrosion control will be required
- Involuntary consolidation or sale
 - US EPA given authority to require consolidation or sale of non compliant systems

AWIA (U.S. EPA Legislation)

- Risk Assessment and Emergency Response Plans
 - Update risk assessments
 - Develop emergency response plans (contingency plans may cover a majority of this)
 - Systems must certify compliance with the requirements to US EPA
 - Staggered deadlines based on facility size.
- UCMR monitoring
 - All facilities serving >3300

Future Activities

- Rule Implementation
- Integration of Asset Management
- Emerging Contaminant challenges
 - More resilient and sustainable systems
 - Role Source Water Protection
 - Integration of asset management

Questions?

Amy Jo Klei, Chief

Division of Drinking and Ground Waters

614-644-2752

Amy.Klei@epa.ohio.gov

<http://epa.ohio.gov/ddagw/>