



## Early Stakeholder Outreach — Primary Drinking Water Standards

*Ohio EPA prepares early stakeholder outreach fact sheets to ensure stakeholders are brought into the review process as early as possible and to obtain additional input and discussion before development of interested party draft rules.*

### Why are these rules being sent out for Early Stakeholder Outreach?

The Division of Drinking and Ground Waters (DDAGW) has reviewed rules in the Ohio Administrative Code (OAC) Chapter 3745-81 to satisfy the five-year rule review requirements of section 106.03 and 106.031 of the Ohio Revised Code. These rules set forth Primary Drinking Water Standards.

### What changes are being considered?

DDAGW is considering all of the following rules to be filed with no changes:

- [3745-81-10](#) Maximum Residual Disinfectant Levels
- [3745-81-11](#) Maximum Contaminant Levels and Best Available Technologies for Inorganic Contaminants
- [3745-81-15](#) Maximum Contaminant Levels and Best Available Technologies for Radionuclide Contaminants
- [3745-81-19](#) Use of Non-centralized Treatment Devices
- [3745-81-28](#) Acceptability of Analytical Results

Revisions to OAC Rules 3745-81-23, 3745-81-26, 3745-81-33, 3745-81-64, 3745-81-67, 3745-81-68, 3745-81-69, 3745-81-76, 3745-81-82, 3745-81-83, and 3745-81-88

include the following:

- Correcting minor grammatical errors
- Updating rule references and citations

Additional revisions include:

- Updating 3745-81-31 to reflect new reporting requirements as outlined by OAC 3745-89-08
- Updating OAC 3745-81-24 to correct grammatical errors, correct rule citations, and require wholesale public water systems (PWSs), as defined by 3745-81-01, to monitor for Disinfection Byproducts (DBPs) at each point of connection (excluding emergency connections) to their purchasers, according to a schedule provided by the director. In addition, requiring wholesalers to provide water to their purchasers that does not exceed 70% of the Total Trihalomethanes (TTHMs) and Haloacetic Acids 5 (HAA5) Maximum Contaminant Levels (MCLs) at the points of connection based on a Locational Running Annual Average (LRAA).

### How can I provide input?

The Agency is seeking stakeholder input on revisions to Ohio Administrative Code rules.

When preparing your comments, be sure to:

- explain your views as clearly as possible;
- describe any assumptions used;
- provide any technical information and/or data used to support your views;
- explain how you arrived at your estimate for potential burdens, benefits or costs;
- provide specific examples to illustrate your views; and
- offer alternatives.

Written comments will be accepted through close of business **November 5, 2018**. Please submit input to:

[DDAGW\\_RULECOMMENTS@epa.ohio.gov](mailto:DDAGW_RULECOMMENTS@epa.ohio.gov).

Please include, "Primary Drinking Water Standards" in the subject line of the email.

### What if I have questions?

Questions on this rules package and the process for submitting comments may be forwarded by email to

[Emma.Brown@epa.ohio.gov](mailto:Emma.Brown@epa.ohio.gov) or by phone at (614) 728-1219. You can find the most current draft and proposed rules, as well as currently effective rules on DDAGW's rulemaking web page at [www.epa.ohio.gov/ddagw/rules.aspx](http://www.epa.ohio.gov/ddagw/rules.aspx).

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## Who will be regulated by these rules?

All PWSs in the State of Ohio will be regulated by these rules.

## What is the rulemaking schedule?

DDAGW will evaluate feedback from the early stakeholder outreach process and then prepare a draft version of rules for interested party review. After incorporating interested party comments, Ohio EPA will start the rule filing process required by the Joint Committee on Agency Rule Review (JCARR). Visit JCARR's website for meeting dates and agenda items at <https://www.jcarr.state.oh.us>.

## What input is the Agency seeking?

DDAGW wants to hear from interested stakeholders who may be impacted by these rules. The following questions may help guide you as you develop your comments.

- Is the general regulatory framework proposed the most appropriate? Should the Agency consider any 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 would especially like to hear information regarding the following from stakeholders who may be impacted, and would like input on the following specific areas:

- Would there be any significant challenges to consecutive systems that add a disinfectant and sell to other water systems if the rule revisions included a requirement for these type of systems to also meet the 70% level at each of their master meter connections to their purchasers? If so, please explain.
- Are sample taps at master meters common? What would be the typical costs associated with installing a sample tap at a master meter?
- Would this regulatory program impact your contract and/or relationship with your wholesale system (if a consecutive) or consecutive system (if a wholesaler)? If so, please explain.
- Would this regulatory program have a positive impact on your business? Please explain.
- Would this regulatory program have an adverse impact on your business? If so, please identify the nature of the adverse impact (for example, license fees, fines, employer time for compliance).

## Contact

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.

For more information, contact Emma Brown at [Emma.Brown@epa.ohio.gov](mailto:Emma.Brown@epa.ohio.gov) or (614) 728 - 1219.