



Memorandum of Response

To: Sophia Papadimos, Regulatory Policy Assistant
From: Mandi Payton, Rules Coordinator
Date: January 24, 2014
Re: Memorandum of Response to CSI Review – License to Operate (LTO) Amendments (OAC Rules 3745-84-01, 3745-84-02, 3745-84-03, 3745-84-04, 3745-84-05, 3745-84-06)

Recommendations

On January 24, 2014, Ohio EPA received the Recommendations for the Division of Drinking and Ground Waters - License to Operate (LTO) Amendments (OAC Rules 3745-84-01, 3745-84-02, 3745-84-03, 3745-84-04, 3745-84-05, 3745-84-06).

The CSI memorandum stated that:

“The BIA identifies the adverse impact as the fee required when applying for a license to operate a public water system. License costs are established in ORC 3745.11. The time it takes to fill out the application and potential sanctions against public water systems for failure to comply are also adverse impacts. However, these rules allow the agency to annually evaluate each public water system, ensuring that operators are complying with safe drinking water regulations and obtaining their licenses to operate. Requirements for public water system designs and OEPA review of those designs are addressed in separate rules not included in this package.

Upon review of the proposed rules and BIA, the CSI Office has determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the amendments is justified.

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

Based on the above comments, the CSI Office concludes that the Ohio Environmental Protection Agency should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.”

Next Steps

At this time, it is Ohio EPA’s plan to move forward with the original filing of this rule package with the Joint Committee on Agency Rule Review.

If you have any questions please contact Mandi Payton at 614-644-2782.