



MEMORANDUM OF RESPONSE

To: Ethan Wittkorn, Regulatory Policy Advocate

From: Mandi Payton, Rules Coordinator

Date: September 26, 2019

Subject: Memorandum of Response to CSI Review – Public Water System Licenses
(3745-84-01, 3745-84-02, 3745-84-03, 3745-84-04, 3745-84-05 and 3745-84-06)

Recommendations

On September 26, 2019, Ohio EPA received the Recommendations for the Division of Drinking and Ground Waters' Public Water System Licenses (3745-84-01, 3745-84-02, 3745-84-03, 3745-84-04, 3745-84-05 and 3745-84-06) rules.

The CSI memorandum stated that:

"The proposed rules impact public water system operators. Churches and schools are exempt. Impacts include the time to apply for and initial and annual fees for licensure. Fees are prescribed in ORC 3745.11 and depend upon various factors based on the populations the water systems are serving. Failure to submit an application on time or to pay the appropriate fee will incur a penalty of ten percent of the required fee. Violation of the rules may lead to suspension, revocation, or denial of a license.

The EPA's stated purpose for the proposed rules is to ensure that the public is supplied a safe and reliable source of drinking water. Further, while LTOs are not specifically required by federal law, they are tied to compliance with the Safe Drinking Water Act and required by ORC 6109.21.

Based on the information above, the CSI Office has no recommendations on this rule package.

The CSI Office concludes that the EPA should proceed in filing the proposed rules 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 these rules with the Joint Committee on Agency Rule Review.

If you have any questions, please contact Mandi Payton at 614-644-3134.