



MEMORANDUM OF RESPONSE

To: Ethan Wittkorn, Regulatory Policy Advocate

From: Mandi Payton, Rules Coordinator

Date: November 9, 2021

Subject: Memorandum of Response to CSI Review – Revised Total Coliform Rules (RTCR) (OAC 3745-81-14, 3745-81-21, 3745-81-50, 3745-81-51, 3745-81-52, 3745-81-53, 3745-81-54, and 3745-81-55)

Recommendations

On November 9, 2021, Ohio EPA received the recommendations for the Division of Drinking and Ground Waters' Revised Total Coliform Rules (RTCR) (OAC 3745-81-14, 3745-81-21, 3745-81-50, 3745-81-51, 3745-81-52, 3745-81-53, 3745-81-54, and 3745-81-55) rules.

The CSI memorandum stated that:

“Impacted communities include Ohio’s public water systems. Potential impacts include meeting testing and monitoring requirements for coliform contaminants, maintenance and sanitation requirements of facility infrastructure, reporting requirements, and actions and contaminations that may lead to a violation. Costs of repeat sampling for facilities that detect contaminants are \$25 per repeat sample; furthermore, the EPA estimates costs of monitoring compliance at \$112 annually. The EPA believes that the proposed rules help to ensure that the public has access to contaminant free drinking water.

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 amanda.payton@epa.ohio.gov.