



# MEMORANDUM OF RESPONSE

To: Ethan Wittkorn, Regulatory Policy Advocate

From: Mandi Payton, Rules Coordinator

Date: November 13, 2019

Subject: Memorandum of Response to CSI Review – CSI Review – Primary Drinking Water Rules  
(OAC 3745-81-23, 3745-81-31, 3745-81-33, 3745 -81-67 and 3745-81-68)

## **Recommendations**

On November 13, 2019, Ohio EPA received the Recommendations for the Division of Drinking and Ground Waters' Primary Drinking Water (OAC 3745-81-23, 3745-81-31, 3745-81-33, 3745 -81-67 and 3745-81-68) rules.

The CSI memorandum stated that:

"Impacted communities include all of Ohio's PWSs. Potential impacts include any costs associated with monitoring for inorganic contaminants, meeting reporting requirements, records maintenance, and cryptosporidium monitoring treatments, if needed. Estimated costs include \$173.67 for inorganic monitoring, \$24.05 for nitrate monitoring, and \$18.99 for nitrite monitoring. Costs associated with storing required records varies with the size of the system, but has an estimated cost of \$360 to \$1200 or an estimated annual cost of \$1642 for account maintenance at an offsite facility. Estimated annual costs for the monitoring and treatment for Cryptosporidium are \$29,346 to cover operation, maintenance, reporting, and wages for support staff. The EPA states that the adverse impacts associated with the rules are justified for ensuring that underground sources of drinking water are protected for public consumption.

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.