

MEMORANDUM OF RESPONSE

To: Michael Bender, Business Advocate

From: Mandi Payton, Rules Coordinator

Date: February 8, 2024

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

Recommendations

On February 8, 2024, Ohio EPA received the recommendations for the Ohio EPA's Division of Drinking and Ground Waters' Public Water System Licenses (OAC 3745-84-01, 3745-84-02, 3745-84-03, 3745-84-04, 3745-84-05, and 3745-84-06) rules.

In summary, the CSI memorandum stated that:

“The business community impacted by the rules includes all Ohio PWSs, excluding schools and churches. The adverse impacts created by the rules include obtaining and renewing licensure, paying the required fees, and properly displaying a license. Failure to pay a required fee will result in an applicant owing an additional amount equal to ten percent of the original fee. Statutory or regulatory violations may lead to the conditioning, denial, suspension, or revocation of a license. The OEPA notes that the changes to the rules reduce the regulatory burden on businesses by modernizing the application process, removing the requirement to return a revoked or suspended license, and allowing for shorter license suspensions. The OEPA states that the adverse impacts to business are justified to implement statutory requirements and ensure the public is supplied with a safe and reliable source of drinking water.

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

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

Next Steps

Currently, 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.