

June 18, 2009

PWS Name
Address
City, State, Zip

County
PWS Type
PWS ID

Re: State Application Form for Ground Water Rule 4-log Treatment of Viruses

The Ground Water Rule (GWR) was promulgated by the U.S. EPA on November 8, 2006 to provide increased protection against pathogens in public water systems using ground water sources. Starting on December 1, 2009, the rule requires public water systems to conduct triggered source water monitoring. Triggered source water monitoring is the collection, within 24 hours, of a raw water sample from each ground water source in use at the time a Total Coliform Rule routine total coliform-positive was collected. The GWR requires a system selling water to complete triggered source water monitoring within 24 hours of notification of a purchaser's routine total coliform-positive sample. The requirements of triggered source water monitoring are outlined in the U. S. EPA Ground Water Rule factsheet enclosed with this letter.

Ground water systems that provide 4-log (99.99%) removal or inactivation of viruses are not required to conduct triggered source water monitoring. You can apply for 4-log treatment removal or inactivation of viruses at any time, but you will be required to complete triggered source water monitoring until approval of 4-log treatment removal or inactivation of viruses is received from Ohio EPA. Public water systems determined to provide 4-log treatment are required to conduct compliance monitoring.

If your system does not submit an application to demonstrate 4-log (99.99%) removal or inactivation of viruses, then triggered source water monitoring will start on December 1, 2009.

Enclosed are two applications: one for systems providing disinfection contact time in a clearwell and pipe storage, and another for systems with disinfection contact time in pipe storage only. Systems should complete the appropriate application if they want to demonstrate 4-log (99.99%) removal or inactivation of viruses. If water treatment plant improvements are necessary to provide 4-log (99.99%) removal or inactivation of viruses, also attach a water supply data sheet and plan review fee. All requested information must be provided. Completed forms should be mailed to your District Office. Application forms are also available on our Web page at <http://www.epa.state.oh.us/ddagw>. The application must be submitted to Ohio EPA by September 1, 2009 if you want to receive approval by December 1, 2009, the start of the GWR triggered source water monitoring.

The following requirements will pertain to public water systems that apply and are determined to be providing 4-log treatment removal or inactivation of viruses:

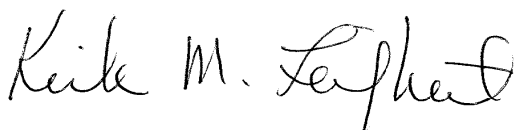
- Once 4-log treatment removal or inactivation of viruses approval is received, compliance monitoring will be required. Compliance monitoring requires you to measure the minimum disinfectant residual concentrations at or before the first customer. If the population served is less than or equal to 3,300, measurements are required daily or if population served is greater than 3,300, measurements must be conducted continuously. Disinfectant residual concentrations are reported in the monthly operating report, along with documentation on flow rates, temperature, pH, clearwell levels and other parameters necessary to determine compliance with the GWR.
- A ground water system with approved 4-log treatment of viruses will, at a minimum, be classified as a Class I PWS due to treating for a contaminant with a maximum contaminant level, and will require at least a Class 1 operator.

Public water systems should consider how these two requirements will impact their operation if it is determined to be providing 4-log (99.99%) removal or inactivation of viruses.

[PWS Name] needs to consider these factors when applying for 4-log treatment approval.

If your system has conventional treatment with lime softening and intends to obtain log removal credits for the lime softening process, or intends to claim log credit for membranes, chlorine dioxide, or ozone, please contact [contact] at [phone number] for assistance.

Sincerely,

A handwritten signature in black ink that reads "Kirk M. Leifheit". The signature is written in a cursive style with a large, prominent "K" and "L".

Kirk M. Leifheit
Assistant Chief
Division of Drinking and Ground Waters

Enclosures: State Application Form for Ground Water 4-Log Treatment of Viruses (2)
U.S. EPA Ground Water Rule Factsheet

Pc: District office