



Record Keeping for Public Water System Owners/Operators & Laboratories

This fact sheet contains an overview of record keeping requirements found in DDAGW rules.

Background

This fact sheet provides an overview of record keeping requirements for public water system (PWS) owners and operators and certified drinking water laboratories. These requirements are established in Ohio Administrative Code (OAC) chapters 3745-81, 3745-82, 3745-85, 3745-89, 3745-95 and 3745-96.

Operator Certification

The Operator Certification program ensures public water and wastewater systems are operated by properly trained and qualified individuals, thereby increasing public health and environmental protection. The program regulations can be found in Chapter 3745-7 of the OAC <epa.ohio.gov/ddagw/rules.aspx> under the tab entitled "Effective Rules."

OAC rule 3745-7-09, "Record keeping requirements and responsibilities of a certified operator" requires owners and operators to ensure records are kept up to date and available onsite at all hours of the day for inspection by Ohio EPA or emergency personnel. The records must also be maintained so they are protected from weather damage and guarantee their authenticity and accuracy. The records must, at minimum, include the following:

- identification of the public water system, sewerage system and treatment works;
- date and times of arrival and departure for the operator of record and any other operator;
- specific operation and maintenance activities;
- results of tests performed and samples taken, unless documented on a laboratory sheet;
- performance of preventative maintenance and repairs or requests for repair of equipment;
- identification of person making individual entries; and
- contain a minimum of the previous 3 months data at all times, and be maintained for at least 3 years.

PWSs and Laboratories

Ohio PWSs and laboratories are regulated by several different rules in the OAC that are implemented by staff in DDAGW, and the Division of Environmental Services (DES). Record keeping requirements for both are spread out through various Chapters in the OAC, including primary drinking water standards, secondary drinking water standards, contingency plans and so on, and are found at <epa.ohio.gov/ddagw/rules.aspx> under the tab entitled "Effective Rules." The table below includes a summary of record keeping requirements for PWSs and laboratories.

Record Keeping Summary for PWSs and Laboratories Found in OAC Rules

Chapter or Rule Number	Chapter or Rule Name	Description of Requirement	Retention Time-frame
Chapter 3745-81 Primary Drinking Water Standards			
3745-81-19	Use of bottled water and point-of-use or point-of-	Keep and make available during sanitary survey, maintenance records of all treatment devices. This is one of several requirements for a nontransient noncommunity	3 years

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	entry treatment devices.	PWS to be able to use a point-of-use or point-of-entry treatment device to achieve compliance with the MCL for arsenic.	
3745-81-27	Analytical techniques.	Requires laboratory to maintain letters of equivalence issued by USEPA Alternative Test Procedure or ATP for methods they approve for compliance monitoring.	As long as method is used in lab
3745-81-33	Record maintenance.	Retain microbiological and turbidity analyses, and copies of any decisions, reports, monitoring plans and certifications developed by the system or an agent of the system.	5 years
		Keep records of chemical analyses, and copies of any decisions, reports, monitoring plans and certifications developed by the system or an agent of the system.	10 years
		Retain records of action taken by the PWS to correct violations.	3 years after last action taken with particular violation
		Maintain copies of written reports, summaries or communications relating to sanitary surveys.	10 years after completion of survey
		Keep copies of public notices and certifications demonstrating notices issued.	3 years after issued
3745-81-45	Ground water rule – reporting and record keeping for ground water systems.	Note: Record keeping for ground water system regulated by the Ground Water Rule, in addition to other record keeping requirements in rule 3745-81-33.	
		Maintain documentation of corrective actions.	10 years
		Keep documentation of public notices as required in rule 3745-81-43.	3 years
		Retain records of decisions on complying with source water monitoring requirements [OAC rule 3745-81-42(A)(5)(b)] or records of invalidation of fecal indicator-positive ground water source samples [OAC rule 3745-81-42(D)].	5 years
		Consecutive systems maintain documents of notification to wholesale system(s) of total coliform-positive samples not invalidated under total coliform rule (OAC rule 3745-81-21).	5 years
		PWSs, including wholesale systems required to conduct compliance monitoring [OAC rule 3745-81-43(B)], maintain records of director-specified minimum disinfectant residual.	10 years
		PWSs, including wholesale systems required to conduct compliance monitoring [OAC rule 3745-81-43(B)], keep records of lowest daily residual disinfectant concentration, and date and duration of any failure to maintain director-prescribed minimum concentration for	5 years

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Chapter or Rule Number	Chapter or Rule Name	Description of Requirement	Retention Time-frame
		period of more than 4 hours.	
		PWSs, including wholesale systems required to conduct compliance monitoring [OAC rule 3745-81-43(B)], keep record of compliance for membrane filtration and of parameters specified by director for appropriate approved alternative treatment. Also keep records of date and duration of any failure to meet membrane operating, membrane integrity or alternative treatment operating requirements for more than 4 hours.	4 years
3745-81-69	Reporting and record keeping requirements for LT2 only.	Keep results from initial and second round of source water monitoring after bin classification; notifications to Ohio EPA that will not conduct source water monitoring because meet criteria; and results of treatment monitoring associated with microbial toolbox options.	3 years
3745-81-72	Disinfection of water from surface water sources.	Retain disinfection profile, disinfection benchmark and all data and analysis used to complete the disinfection profile.	Indefinitely
3745-81-75	Record keeping, reporting and actionable items.	Maintain recorded results of individual filter turbidity monitoring.	3 years
3745-81-77	Treatment techniques for control of disinfection byproduct (DBP) precursors.	Maintain a monitoring plan.	5 years in accordance with OAC 3745-81-33
3745-81-79	Filter backwash recycling.	<p>Maintain the following information on recycle flow of spent filter backwash water, thickener supernatant or liquid from a dewatering process:</p> <ul style="list-style-type: none"> • a copy of the recycle notification and information submitted to the director. • list of recycle flows and frequency in which returned. • average and maximum backwash flow rates through filters. • average and maximum durations of filter backwash in minutes. • typical filter run length and written summary of how run length determined. • type of treatment provided for recycle flow. • data on physical dimensions of equalization and treatment units, typical and maximum hydraulic loading rates, type of treatment chemicals used and average dose and frequency of use, and frequency that solids are removed. 	U.S. EPA recommends 10 years
3745-81-90	Control of lead and copper – reporting and record keeping	Retain records of sampling data, analyses, reports, surveys, letters, evaluations, schedules, director’s determinations and other information required by OAC	12 years

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	requirements.	rules 3745-81-80 through 3745-81-89.	
<u>Chapter 3745-82 Secondary Contaminant Standards</u>			
3745-82-03	Monitoring for compliance with secondary maximum contaminant levels.	Keep daily record of amount of fluoride compound added and the fluoride content of water as delivered to customers.	10 years recommended, in accordance with OAC 3745-81-33
<u>Chapter 3745-85 Contingency Plans</u>			
3745-85-01	Contingency plans.	Keep 3 copies of [updated] contingency plan at various accessible, secure locations in the service area.	Keep until replaced with new plans or revisions; plans required to be updated annually
<u>Chapter 3745-89 Laboratory Certification</u>			
3745-89-04	Renewal of laboratory certification.	Maintain microbiological records.	5 years
		Maintain lead and copper records.	12 years
		Maintain chemical and all other records not mentioned.	10 years
<u>Chapter 3745-95 Backflow Prevention and Cross-Connection Control</u>			
3745-95-06	Backflow prevention devices.	Maintain inventory of installations and inspections of an approved connection between an auxiliary water system and PWS.	Keep until replaced with new inventory
<u>Chapter 3745-96 Consumer Confidence Reports</u>			
3745-96-04	Report delivery and record keeping.	Retain copies of consumer confidence reports (CCR).	3 years

Note: All record keeping requirements may not be represented in this table. Consult with your DDAGW District Office representative for more information. <epa.ohio.gov/districts.aspx>

More Information

There are several divisions within the Ohio EPA in addition to DDAGW, which have their own requirements or policies on record keeping. Please contact the Office of Compliance Assistance and Pollution Prevention (OCAPP) for more information on record keeping requirements not part of DDAGW programs.

Phone: (614) 644-3469 or (800) 329-7518

<epa.ohio.gov/ocapp/ComplianceAssistanceandPollutionPrevention.aspx>

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