

CSI - Ohio

The Common Sense Initiative

Business Impact Analysis

Agency Name: Ohio Environmental Protection Agency

Regulation/Package Title: Miscellaneous No Change 2014

Rule Number(s): 3745-34-09, 3745-34-11, 3745-34-16, 3745-34-17, 3745-34-18, 3745-34-21, 3745-34-26, 3745-34-27, 3745-34-38, 3745-34-56, 3745-34-57, 3745-34-61, 3745-34-62, 3745-34-63, 3745-81-15, 3745-81-28, 3745-81-80, 3745-81-82, 3745-81-83, 3745-81-84, 3745-81-85, 3745-81-86, 3745-81-88, 3745-81-89, 3745-81-90, 3745-88-01, 3745-88-02, 3745-91-10

Date: 01/09/2014

Rule Type:

- | | |
|----------------------------------|---|
| <input type="checkbox"/> New | <input checked="" type="checkbox"/> 5-Year Review |
| <input type="checkbox"/> Amended | <input type="checkbox"/> Rescinded |

The Common Sense Initiative was established by Executive Order 2011-01K and placed within the Office of the Lieutenant Governor. Under the CSI Initiative, agencies should balance the critical objectives of all regulations with the costs of compliance by the regulated parties. Agencies should promote transparency, consistency, predictability, and flexibility in regulatory activities. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

Regulatory Intent

1. Please briefly describe the draft regulation in plain language.

Rules in Chapter 3745-34 of the Ohio Administrative Code (OAC) establish requirements for the underground injection of fluids into a well. OAC rules in Chapter 3745-34 proposed to be filed with no changes establishes the following requirements:

- For an operator of owner of an injection well;
- When minimal discharge of wastewater from the treatment of drinking water may occur;

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- Permit requirements for class V injection wells;
- Signatory requirements for injection control well permit applications and reports;
- When the Agency Director can issue a permit for a class V injection well based on an area instead of an individual permit;
- The duration of permits for class I and V wells;
- Drilling and operating permits for class I and V wells;
- Outlines conditions that apply to underground injection permits; operating, monitoring and reporting requirements for class I injection well operators;
- Testing and monitoring for permitted class I injection wells;
- Class I injection well operator establishes requirements and submits closure plan;
- Financial responsibility requirements for owners and operators of injection well for closure plan and post closure care;
- Annual permit fee for disposing of hazardous waste.

OAC rule 3745-81-15 provides the maximum contaminant levels for radionuclide contaminants in public drinking water. It also establishes best available technology treatment standards for the regulated radionuclides. OAC rule 3745-81-28 establishes the requirement for all analytical results used to determine compliance with the rules in Chapter 3745-81 of the Administrative Code to be determined and reported by a laboratory certified by or otherwise acceptable to the director of Ohio EPA, with the exception of measurements for chlorine residual.

Rules 3745-81-80 through 3745-81-90 of the Administrative Code describe the national drinking water regulations for lead and copper, and include provisions about corrosion control treatment, source water treatment, lead service line replacement, public education, monitoring requirements, analytical methods, reporting and record keeping.

Rules 3745-88-01 and 3745-88-02 of the OAC describe the criteria for an entity to be designated a disadvantaged community and requirements to receive a loan for their public water system.

Rule 3745-91-10 of the Administrative Code establishes what public water systems are required to develop and submit a source water protection plan.

These rules have been reviewed pursuant to the five-year rule requirements set forth in ORC Section 119.032 and no changes are being proposed at this time.

2. Please list the Ohio statute authorizing the Agency to adopt this regulation.

OAC rules in Chapter 3745-34 are authorized by ORC Section 6111.043. Rules in Chapters 3745-81, 3745-88 and 3745-91 of the OAC are authorized by ORC Sections 6109.04, 6109.22 and 6111.42.

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3. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?

If yes, please briefly explain the source and substance of the federal requirement.

Yes, these regulations enable Ohio EPA to administer regulations that improve and maintain the quality of waters of the state for the purpose of protecting the public health and welfare, and to enable the present and planned use of such waters for public water supplies, industrial and agricultural needs, propagation of fish, aquatic life, and wildlife, and recreational purposes. OAC rules in Chapter 3745-34 enable Ohio EPA to implement requirements that protect the waters of the state and public health from injection of underground contaminants.

These regulations also enable the state to administer the Safe Drinking Water Act (SDWA), as well as retain primary enforcement authority from the Federal Government. These rules, including 3745-81-15 and 3745-81-28 are used by Ohio EPA to protect drinking water sources from potential contaminants as outlined in the SDWA. Rules 3745-81-80 and 3745-81-90 of the OAC assist the state with implementing the federal Lead and Copper Rule. OAC rules 3745-88-01 and 3745-88-02 enable Ohio EPA to administer low interest loans to PWSs determined to be disadvantaged and needing to improve their infrastructure to meet SDWA requirements.

Rule 3745-91-10 of the Administrative Code does not specifically implement a federal requirement, but it protects public health by ensuring systems develop a plan for the long term protection of their source water.

4. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

Immediately below are rules that exceed the federal requirement.

- 3745-34-11: The division requires operators of class V wells to submit additional information in order to better evaluate the threat posed by the injection operation to any nearby drinking water supplies.
- 3745-34-16: The requirements were previously established in Ohio statute, Section 6111.043 of the Revised Code.
- 3745-34-17: DDAGW requires the permit application/renewal to be signed by a person in authority, such as the vice-president or their superior. This ensures they are taking responsibility for the information provided to the agency.
- 3745-34-21: Ohio requires most facilities with underground injection wells to renew their permits more frequently in order to meet provisions previously established in Section 6111.043 of the Revised Code.
- 3745-34-38: Ohio requires class I facilities submit monitoring reports more frequently in order to better evaluate the operation and potential for contamination.
- 3745-81-85: DDAGW may require community PWSs to provide more public education to immunocompromised populations if determined necessary by the

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Director, which is consistent with the previously established public notification requirements in rule 3745-81-32 of the Administrative Code.

- 3745-81-86: DDAGW omitted waivers from this rule because the provision would not provide meaningful regulatory relief and increase costs to the agency.

5. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

The public purpose for adopting such regulations is ensuring the availability of a safe and adequate supply of public drinking water. These rules help to achieve this purpose by ensuring PWSs have drinking water sources that are protected from contaminants through the implementation of the Underground Injection Control (UIC) Rule, the Lead and Copper Rule, the implementation of radionuclide maximum contaminant levels, providing funds to disadvantaged PWSs, and developing a long term protection plan for a PWSs water source.

6. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

The success of the radionuclide, analytical results, lead and copper rules, and disadvantaged community loan rules (i.e., OAC rules 3745-81-15, 3745-81-28, 3745-81-80 through 3745-81-90, and 3745-88-01 and 3745-88-02) is based on compliance rates. The success of the plan approval rules (OAC Chapter 3745-91) is determined by compliance rates discovered during sanitary surveys and through plan approval/review. Over half of the underground injection control rules (i.e., OAC rules in Chapter 3745-34) success is based on compliance rates and the remainder provides support necessary for determining potential hazards and/or assist in determining compliance.

Development of the Regulation

7. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

Stakeholders include public water system owners and operators, consultants, environmental organizations and the general public. The only measure a person has to take to be notified of DDAGW's potential rule activity is to request to be added to our electronic or hard-copy mailing list.

Stakeholders were notified of DDAGW's plans to file this rule package with no changes on February 6, 2013, and again on April 19, 2013 by electronic or regular mail in accordance with their request.

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8. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

Stakeholders did not provide any comments during early stakeholder outreach.

9. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

Ohio EPA obtained statutory authority in Chapters 6109 and 6111 of the Revised Code and promulgated these rules under Administrative Code Chapters 3745-34, 3745-81, 3745-88 and 3745-91. References used include the latest revisions to 40 CFR Parts 141, 142, and 144. The federal counterparts, which include the SDWA Amendments of 1996 and the Clean Water Act, are the foundation for these rules.

10. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?

In order to retain primary enforcement authority, Ohio EPA is required to adopt the federal counterparts of rules. Therefore, Ohio EPA could not consider alternatives to these rules (i.e., rules in OAC Chapter 3745-34 and 3745-81).

OAC Chapter 3745-88 establishes what would qualify PWSs disadvantaged communities and the requirements to apply for loans. There are no alternatives to consider because these requirements specify how federal money awarded to the state are to be used.

OAC rule 3745-91-10 incorporates guidance from U.S. EPA that is highly recommended for PWSs. There currently are no regulatory alternatives to obtain compliance.

11. Did the Agency specifically consider a performance-based regulation? Please explain. *Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.*

Yes, most of the rules in this package are performance-based. The UIC rules, and the Lead and Copper rules (i.e., OAC Chapters 3745-34 and 3745-81) establish the required outcome protecting waters of the state and for meeting public drinking water standards for lead and copper.

OAC Chapter 3745-88 and rule 3745-91-10 are not performance-based in and of themselves. However, these rules indirectly influence compliance with other rules that are performance-based such as those that protect public drinking water supplies and water of the state.

12. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

Ohio EPA reviewed internal regulations and determined there are not duplications.

13. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

Ohio EPA provides draft rule revisions to staff for internal review and comment. When needed, procedures, guidance and policy are developed to support consistent application. Additionally, training may be provided and all effective rule revisions are distributed to staff.

Adverse Impact to Business

14. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:

a. Identify the scope of the impacted business community;

Most PWSs in the state of Ohio, as well as facilities with UIC wells.

b. Identify the nature of the adverse impact (e.g., license fees, fines, employer time for compliance); and

There is no adverse impact (i.e., \$0) associated with OAC rules 3745-34-21, 3745-34-27 and 3745-81-28. PWSs will only be affected by OAC rules in Chapter 3745-88 if they choose to apply for a loan.

The nature of the adverse impact of rules in Chapter 3745-34 felt by most facilities with UIC wells include updates to and maintenance of records, applying for permits, monitoring and reporting requirements, and the development and implementation of a well closure plan.

For OAC rule 3745-81-15, the adverse impact is felt by systems which exceed maximum contaminant levels for radionuclides.

The adverse impact to community and nontransient noncommunity PWSs affected by rules 3745-81-80 through 3745-81-90 include requirements for monitoring and reporting lead and copper to Ohio EPA, installing corrosion control treatment if needed, lead service line replacement if necessary, as well as public education and consumer notification of monitoring results.

Rule 3745-91-10 requires community PWSs to develop a drinking water source protection plan.

c. Quantify the expected adverse impact from the regulation.

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a “representative business.” Please include the source for your information/estimated impact.

3745-34-09: This rule references several hazardous waste rules of the Administrative Code. Although there is a cost of compliance associated with this rule, the Ohio EPA cannot develop an accurate cost of compliance estimate due to the number of variables involved. The variables include the amount and types of hazardous waste that are managed, and the methods used to manage them.

3745-34-11: Below is a summary of the costs for inventory, closure, conversion and permitting a class V injection well. (The actual permit cost is established in the cost of compliance summary for OAC rule 3745-34-12.) The cost estimates below are based on the presence of only one well. The estimated costs for the submittal of inventory information apply to all class V injection wells. The cost estimates for submitting a closure plan with the notification, closing in compliance with the submitted plan, and submitting a report certifying closure applies only to owners or operators of class V underground injection control (UIC) wells used to inject industrial or other wastes. These costs are estimates and actual costs could vary depending on the well location, the number of wells and the action taken by the owner/operator of the class V underground injection well.

- A. Inventory information costs: Estimated cost of compliance with the gathering and submittal of the well inventory requirements of OAC rule 3745-34-11(M): \$55.57
- B. Estimated cost for complying with the closure notification requirements: The estimated costs of compliance with the closure requirements within OAC rule 3745-34-11(O) are \$54.17
- C. Costs for complying with closure plan, closure, and closure certification requirements: The closure requirements within OAC rule 3745-34-11(O) are detailed below for owners or operators of class V UIC wells used to inject industrial or other wastes. The cost to comply with closure requirements affects about 26 out of 22,461 (or 0.1%) of class V wells in Ohio.
 - 1. Cost of compliance with rule requirements to submit a closure plan: \$1,079.67
 - 2. Cost of compliance with rule requirements for closure of a class V injection well: \$6,911.10
 - 3. Cost of compliance with rule requirements to submit a closure certification report: \$1,079.67
- D. Total cost of compliance with OAC rule 3745-34-11 (A+B+C1+C2+C3): \$9,180.18

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2002 - 2013.

3745-34-16: The cost of compliance with this rule was estimated based on all costs calculated from the U.S. EPA document “Geologic CO2 Sequestration Technology and Cost Analysis,” June 2008. The costs are broken up into eight categories as shown below:

Site characterization report: \$ 4,603.29
Standard operating procedures: 2,301.65
Well construction drawings and plans: 5,412.58
Narrative and as built plans: 5,144.55
Maintenance and inspection procedures: 4,603.29
Financial assurance: 463.49
Chemical analysis of injection formation fluids: 1,082.52
Chemical analysis of injectate: 2,165.03

Total cost for facilities with Class V wells: \$ 25,776.40

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2008 - 2013.

3745-34-17: Ohio EPA estimates that it will cost each permit applicant or permit holder \$30.85 to \$61.69 per signature measure in work time to have the appropriate person sign each application and report submitted. Depending on the type of well, the applicant may need to submit anywhere from 12 to 15 reports per year.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2004 - 2013.

3745-34-18: The cost for class V injection well permittees to comply with this rule has been established in rule 3745-34-12 of the Administrative Code. Costs incurred will likely be less for a well area permit because the permit itself covers more than one well, whereas the permit costs associated with OAC rule 3745-34-12 of the Administrative Code are for an individual well permit.

3745-34-26: The estimated cost for facilities with UIC wells to comply with this rule is somewhat dependent on whether the facility is in compliance with UIC permit requirements.

Based on cost estimates provided by some of these facilities, the estimated average annual cost of complying with this rule is between \$61,691.11 and \$375,081.93 per well depending on the type and size of the facility. Generally facilities in Ohio operate between one and four wells at a time. The vast majority of the total costs (approximately 99%) are operations and maintenance costs with the remaining cost being attributed to providing information to the director of Ohio EPA and maintaining

adequate records. The total cost includes personnel, equipment/capital, and operating costs.

In some instances, class I facilities may have to bear additional costs under this rule depending on certain circumstances. If a facility's noncompliance with their permit creates any adverse impact on the environment, they will be required under this rule to take all reasonable steps to mitigate the adverse impact which could cost the facility up to \$123,382.21. Additionally, if a facility is experiencing operational problems and cannot ensure proper operation of the well, they may be required to install a new pump, rework the well, or even install a whole new monitoring system. These steps could cost the facility approximately \$30,845.55, \$308,455.53, and \$987,057.70 respectively but are not required as a matter of course.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2004 - 2013.

3745-34-38: The cost of compliance with this rule will vary depending on the specific circumstances of each class I injection well. This includes \$676.74 per year to maintain annulus pressure, \$16,918.48 per year for monitoring, and up to \$3,248.35 per year for reporting.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2000 - 2013.

3745-34-56: The estimated cost to comply with this rule is based on the experience of Agency staff. It is estimated it will cost the regulated community approximately \$1,316.03 per year to maintain the annulus pressure in each Class I hazardous waste injection well and \$3,948.09 per event to submit a well workover plan to the director of Ohio EPA for approval.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2001 - 2013.

3745-34-57: This rule requires the owner or operator of a class I injection well submit a written waste analysis plan, conduct waste sampling and analysis according to the plan, conduct several tests on a yearly basis to ensure the mechanical integrity of the well, and conduct ground water monitoring. Based on recent cost estimates submitted by owners and operators of class I injection wells the cost estimate for complying with these requirements includes the following one-time and yearly costs: (One-time) Preparing the waste analysis plan \$6,580.15; (Annually) Waste sampling and analysis \$13,160.30, mechanical integrity testing \$6,580.15, ground water monitoring \$13,160.30. The cost to comply with this rule is \$39,480.91 the first year and \$32,900.76 every year after unless a well workover is conducted and additional

mechanical integrity testing is conducted. A well workover may include testing the casing, the cement bond, and more as described in the rule.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2001 - 2013.

3745-34-61: This rule requires the owner or operator of a class I injection well create and submit a post closure plan as part of their permit application, make a notation on the deed of the property on which the facility is located regarding the use of the property, and retain for three years records regarding the injection fluid. Based on information from facility closures, it is estimated that the average cost to comply with these requirements ranges from \$658.02 to \$6,580.15.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2001 - 2013.

3745-34-62: This rule requires owners and operators of facilities handling hazardous waste, class I underground injection control wells, to comply with financial responsibility requirements for closure and post closure care found in the hazardous waste rules. Under these rules, prior to operation a facility must prepare detailed written estimates for the cost of closing the facility and providing post-closure care and demonstrate they have the financial assurance to fulfill those costs in the form of one of the following for both closure and post closure: a trust fund, a surety bond guaranteeing payment into a trust fund, a letter of credit, insurance, a financial test and guarantee, or multiple financial mechanisms. The cost to comply with this rule will vary for each well depending on the site-specific circumstances. However based on cost estimates submitted by the owners and operators of class I wells, the average cost to comply with this rule is estimated at \$263,206.10 to \$329,007.62 per well.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2001 - 2013.

3745-34-63: The cost of compliance with this rule was estimated for class I injection wells. The costs are based on sections 6111.046 and 6111.047 of the Revised Code, and include the annual permit fee, which is the cost for disposing of hazardous and non-hazardous waste generated on site, or hazardous waste generated off site. The estimate also includes the actual disposal cost, which is the dollar per ton disposed. The total estimated cost of compliance with this rule is between \$46,171.21 and \$73,330.74.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2009 - 2013.

3745-81-15: The cost of compliance with this rule is expected to be minimal for community public water systems in Ohio. The estimated cost of compliance for a system needing to install treatment and employ an ion exchange water softening system is \$8,233.42 for the initial equipment/capital cost for the treatment system and \$6,080.06 annually for operating costs, which includes materials and personnel. The cost of compliance was based on a small community water system, and therefore, if any other water systems develop radionuclides violations the cost of compliance would vary based on the size of the system.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2003 - 2013.

3745-81-80 through 3745-81-90: The estimated cost of compliance was derived from the cost estimates contained in the "Information Collection Request: National Primary Drinking Water Regulations for Lead and Copper" and "Short-term Regulatory Changes to the Lead and Copper Rule" requested by U.S. EPA (EPA ICR 1912.01 and 1896.04). These documents calculate the average annual cost for systems to comply with the changes to the Lead and Copper Rule to range from \$6,613.00 to \$6,653.00 per system. (The annual average range accounts for differing sizes and types of public water systems, and is estimated for a three year period.)

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2001 (National Primary Drinking Water Regulations) and 2007 (Short-term Regulatory Changes) - 2013. The amendments to these OAC rules made in 2003 (U.S. EPA's Lead and Copper Rule, Minor Revisions) reduced the annual cost of compliance to PWSs.

3745-91-10: The cost of compliance for rule 3745-91-10 includes costs associated with developing a drinking water source protection plan. Based on data from grants made by Ohio EPA in 2004 and 2005, the cost to counties, townships or municipal corporations operating a community public water system to develop a drinking water source protection plan ranges from approximately \$1,086.38 to \$43,455.25. The variability in the cost is dependent in large part on how the entity chooses to develop the drinking water source protection plan.

Ohio EPA offers workshops presented by trained agency staff to assist counties, townships or municipal corporations operating community public water systems to develop a drinking water source protection plan. Ohio EPA has also developed materials for use in preparing the drinking water source protection plan. If the public water system collaborates with Ohio EPA to develop the plan, the cost to the entity can be kept to staff time and supplies. Information provided by several small municipal corporation public water systems that participated in a recently completed workshop series indicates the cost to these systems was between \$1,086.38 and \$1,303.66, primarily in staff time, to develop a drinking water source protection plan.

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If the public water system decides to hire a consulting or engineering firm to develop or assist in developing the drinking water source protection plan the costs will be higher, between \$7,604.67 and \$43,455.25. Cost sharing by water systems in the same geographic area, such as a county can reduce these costs substantially. For example, ten Fairfield county public water systems worked together with a consultant to develop drinking water source protection plans at a cost of \$7,604.67 per system.

* U.S. Department of Labor, Bureau of Labor Statistics Inflation Calendar used to account for inflation from 2009 - 2013.

15. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The Agency considers the overall cost for complying with these regulations to be minor in comparison with ensuring the public is supplied with a safe and reliable source of drinking water.

Regulatory Flexibility

16. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

No exemptions or alternative means of compliance for small businesses have been written into this rules package.

17. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

Ohio EPA does not assign fines and penalties for first-time offenders, and prefers to obtain compliance through outreach first and, if needed, written notice of violations prior to any type of formal enforcement.

18. What resources are available to assist small businesses with compliance of the regulation?

Small businesses PWSs can turn to their Ohio EPA District Office Inspector or Rural Community Assistance Program (RCAP) for technical assistance. Ohio EPA contracts with RCAP to provide assistance for PWSs with a population of 10,000 or less. RCAP can help small business PWSs with a number of tasks, such as:

- Preparing loan applications, including determining the ability to repay;
- Determining the most cost effective action for providing a safe drinking water supply;

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- Developing and/or completing their capability assurance plan.

RCAP also sponsors training seminars such as utility board training, financial management, asset management and budget and rate setting training. Ohio EPA also provides both administrative and technical training for PWSs at low to no-cost. In addition to these informational resources, financial assistance may be available through Ohio EPA's Drinking Water Assistance Fund (DWAF).