



Division of Drinking and Ground Waters Response to Comments

Draft Rules to adopt the Federal Revised Total Coliform Rule

- 3745-81-01, Primary drinking water standards definitions
- 3745-81-12, Maximum contaminant levels and best available technologies for organic contaminants
- 3745-81-14, Maximum contaminant levels for microbiological contaminants
- 3745-81-21, Coliform monitoring requirements
- 3745-81-32, Public notification
- 3745-81-41, Ground water rule - general requirements and applicability
- 3745-81-42, Ground water rule - ground water source microbial monitoring and analytical methods
- 3745-81-43, Ground water rule - compliance monitoring requirements for ground water systems
- 3745-81-44, Ground water rule - treatment technique violations for ground water systems
- 3745-81-45, Ground water rule - reporting and recordkeeping for ground water systems
- 3745-81-50, Revised total coliform rule - general monitoring requirements
- 3745-81-51, Revised total coliform rule - routine monitoring requirements
- 3745-81-52, Revised total coliform rule - repeat monitoring and E. coli requirements
- 3745-81-53, Revised total coliform rule - coliform treatment technique triggers and assessment requirements
- 3745-81-54, Revised total coliform rule - violations
- 3745-81-55, Revised total coliform rule - reporting and recordkeeping
- 3745-81-60, Inspections and response requirements
- 3745-81-61, Treatment technique requirements for significant deficiencies
- 3745-81-70, Monitoring requirements for disinfectant residuals
- 3745-81-74, Turbidity and disinfection monitoring requirements for surface water systems
- 3745-96-02, Required report content

Agency Contact for this Package

Susan Kramer, Division of Drinking and Ground Waters (DDAGW)
(614) 644-2752, Susan.Kramer@epa.ohio.gov

Ohio EPA issued public notice and requested a second round of interested party comments for the period of Nov. 18, 2015 to Dec. 2, 2015 on revised draft rules in the Ohio Administrative Code (OAC). This document summarizes the comments and questions received during the interested party public comment period.

Ohio EPA reviewed and considered all comments received during the interested party comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

General Comments

Comment 1: “I favor OEPA having the same testing criteria for coliform bacteria. The MPN method has worked much better in that it enables us to quantitatively evaluate. I feel there is no comparison between pass/fail versus actual coliform numbers. Having different testing methods (county vs. EPA’s methods) makes no logical sense. I hope to see the EPA rule change to MPN for coliform bacteria testing.”
(Brad Ulery, Beinhower Bros. Drilling Company)

Response 1: Thank you for your comment about using the most probable number (MPN) method for coliform bacteria. For the purpose of Ohio EPA’s primary enforcement agreement with U.S. EPA, the Agency is required to adopt methods for the analysis of drinking water contaminants that are federally approved and at least as stringent as the federal counterpart. In the case of the Revised Total Coliform Rule, the approved method is to look at the presence and absence of coliform bacteria. This method triggers action more quickly than the MPN method.

End of Response to Comments