

**Local Health Department Coordination and
Notification of Ground Water Exceedances of
MCLs/HALs Near Regulated Facilities**

“New Normal”

What is the “New Normal”

- If Ohio EPA has evidence that someone is:
 - Drinking bad water; or
 - Breathing bad air; or
 - Exposed to contaminated soils; then

We act NOW!

“Old Normal”

- Passed the buck to another Agency with more jurisdiction than us;
- Let the regulatory process play out before acting.

Examples of “New Normal” in Action:

- Vapor Intrusion
 - New Lexington Apartments
 - Cleveland Day Care
 - Cincinnati Dry Cleaner

Lead-contaminated Miami Twp. park cleanup estimated at \$3M



Frankfort RCRA Closure



Coordination Between LHD and Ohio EPA

- Health Department has jurisdiction over private wells
- Ohio EPA reviews ground water data from many sources:
 - Landfills
 - Hazardous Waste Sites
 - Superfund sites
 - Voluntary Action Program Sites
 - Surface Water Ponds

Coordination

- Starts with Ohio EPA identifying ground water above MCLs or HALs
- 2 causes:
 - Natural
 - Point source – regulated or unregulated.

Natural

- If the contamination is due to natural conditions (exception is coal mining impacts)
- Letter sent to Local Health Department
- Purpose of the letter is to
“inform you of exceedances of health-based concentration levels, discussed in more detail below, for “constituent” in the regional ground water quality in the area of the “Facility” at “address”. This is to allow you to take this into consideration when advising current residences using wells for potable water and if future residential wells are proposed in this area. “

Natural

- Letter will also contain a table.

Monitoring Well	Total "constituent" ug/l	MCL/HAL ug/l	Date	Historic Range	Monitored Unit
				Table 1	

Natural

- LHD will only receive one letter per constituent per facility.
- A letter may address many constituents.

Un-Natural Levels – Contamination from a point source

- Regulated or Unregulated
- Ohio EPA identifies:
 - Contaminants in ground water at concentrations above MCLs/HALs
 - Good probability these contaminants have migrated off site at levels above MCLs/HALs
- 2 Situations
 - Private well users may be affected
 - No private well users present

No Private Well Owners Nearby

- Notify the LHD/ODH of situation to prevent future water supply wells from being installed.
- Let regulatory process play out.
 - Assessment of concentration, extent and rate.
 - Corrective Action

Private Water Supply Wells Potentially Impacted

- Elevated to Ohio EPA Management – District and Division Chiefs, Assistant Chiefs and Managers notified.
- Discussion as to actions to be taken based on facts of the situation.
- LHD and ODH notified

Private Water Supply Wells Potentially Impacted

- Any action taken will be coordinated with the LHD and ODH as the private water supply well is their jurisdiction.
- Ohio EPA will approach as assisting the LHD/ODH and as the regulator of the source of contamination.
- Who does what will be discussed and determined prior to action being taken.

Private Water Supply Wells Potentially Impacted

- Where regulations and statutory authority allow, Ohio EPA will request that the responsible party sample the private wells.
- If they refuse or unreasonably delay or there is no responsible party/regulatory authority then Ohio EPA and the LHD in coordination with each other will sample the private well.

Roles will be Determined

- Who notifies the well owner and arranges a sampling time.
- Messaging – handouts, fact sheets, explanations, etc. – Ohio EPA PIC involvement.
- Who will sample the well
- Who will analyze the samples
- Who will report the results to the well owner.

Many Different Scenarios!

- Each situation will be different.
- Each situation will require a different response.
- Ohio EPA is developing a procedure for staff to use to communicate when a situation is due to natural conditions and when to “elevate the situation”.

Questions?