

# APPENDIX D

## Project Priority Ranking System

The purpose of the priority ranking system is to establish a list of eligible water systems and their proposed projects to be funded in a manner that allows the most serious risks to public health be given the highest priority. Eligible projects are capital improvement projects that are necessary to ensure compliance with the National Primary Drinking Water Regulations defined in the SDWA, all other applicable regulations of the SDWA, all applicable regulations put forth in the ORC, all applicable rules of the OAC, or as determined necessary by the director.

All eligible water systems that submit proposed projects will be rated with respect to four categories to determine their ranking and selection for funding under the WSRLA. These categories are:

1. Public health issues;
2. Continued compliance with federal and state SDWA requirements;
3. Bonus points for effective management;
4. Regionalization

The overall ranking of projects is based on the sum of all points received in each category as described in the project scope. However, before any final funding is awarded, each project will be carefully evaluated to ensure the scope of the project has not changed and the project addresses the type of work, component types and project description needs addressed in the nomination form for which points were awarded. Where the scope of the project has changed, then either (1) the scope of the submitted project will need to be revised to adequately address the issues for which points were awarded, or (2) the project will be rescored to determine if it is still eligible for funding and the terms under which the project will be funded, if still eligible. Any project whose scope changes after submitting the nomination form will need to be rescored to determine eligibility and funding terms.

For projects involving regionalization, priority points for the central system and each system being regionalized, shall be summed for each separate ranking category. The total points for each sub-category shall not exceed the maximum amount listed for that sub-category. For example, a project consolidating three water systems with bacterial MCL violations would receive no more than 100 points for the bacterial contamination sub-category.

Each category is briefly described below.

**Public Health Issues**

The greatest emphasis will be placed on addressing public health issues related to the acute contaminants: microbial, groundwater rule, surface water treatment rule, nitrate/nitrite and cyanotoxins. The period of analysis will be the 24 months prior to inclusion on the priority list unless the system is under Director’s Final Findings and Orders to correct the issue, then the public health points will stand until the project is completed. MCL violations caused by failure to monitor or report will not be included in the analysis. The following are the points assigned to the referenced levels of contamination.

Acute Contaminants (Time period inclusive of most currently available quarterly data)

Bacteriological Contamination (Addressable through infrastructure improvements) (select only one)	
No Level 2 Assessments	0 points
Level 2 Assessment	60 points
Confirmed Distribution E. coli	100 points

Groundwater Rule (See EPA The Ground Water Rule (GWR) Implementation Guidance (EPA-816-R-09-004) Section 3.9.8 – Treatment Technique Violations for more information).	
No Violations	0 points
Confirmed E. coli	100 points

Surface Water Treatment Rule (turbidity and chlorine contact time)	
No treatment technique violations	0 points
One treatment technique violation	60 points
Two or more treatment technique violations	100 points

Nitrate / Nitrite (select only one)	
Level consistently less than 8.0 mg/L / 0.8 mg/L	0 points
Level >8.0 mg/L <10 mg/L / >0.8 mg/L ≤ <1 mg/L	60 points
Level >10 mg/L / 1 mg/L	100 points

Cyanotoxins (in finished water)	
Level < 50% of the threshold	30 points
Level ≥ 50% of the threshold	60 points
One or more threshold exceedances	100 points

Chronic Contaminant Groups (per previous 24 months):

Chronic contaminants with MCLs are addressed as shown below with greater weight being given to exceedances of the Longer-term Health Advisories for a 10-kg Child (CHA), as published by U.S. EPA in the latest issue of “Drinking Water Regulations and Health Advisories.” For contaminants with no MCL, Drinking Water Equivalent Levels (DWELs) or 10<sup>-4</sup> Cancer Risk Levels as listed in the same publication will be used to determine ranking points.

Inorganic Chemicals (IOCs), Volatile Organic Chemicals (VOCs), Radionuclides, Disinfection Byproducts, Arsenic	
No MCL violations	0 points
Level at least 50% of MCL	30 points*
≥ MCL or above Longer-term Child Health Advisories or DWEL or 10 <sup>-4</sup> Cancer Risk	60 points*

For contaminants without MCLs	
Above DWEL or 10 <sup>-4</sup> Cancer Risk or Longer-term Child Health Advisories	60 points*

\*Multiply by the number of contaminants with violations or exceedances (of CHAs, DWELs, or Cancer Risk) averaged over the previous 24 months. TTHMs/HAA5s are a single contaminant. Disinfection byproducts and arsenic points are based on the running annual average. Points may also be assigned for this category if the project will address disinfection byproducts at satellites, including looping projects.

Lead and Copper	
In compliance	0 points
Exceedance of copper action level	25 points
Exceedance of lead action level	45 points

Boil Order/ Use Advisory (for previous 12 months). Points may only be assigned if the project will address the problem that caused the boil order or use advisory. No points awarded for type 25 or 26 violations.	
No boil order or use advisories	0 points
Boil advisory; one to four boil order/use advisory events	25 points
Boil advisory; five or more boil order/use advisory events	45 points

Disinfection Residual (addressable through infrastructure improvements including looping)	
No violations	0 points
One to five violations	15 points
Six or more violations	30 points

Manganese, Strontium, PFOS, PFOA Health Advisory Levels (not restricted to the previous 12 months)	
No HAL exceedences	0 points
Level $\geq$ 50% HAL for <u>only one</u> Health Advisory DWEL	30 points
Level $\geq$ 50% HAL for <u>more than one</u> Health Advisory DWEL	60 points

Contamination or Inadequate Supply in Private Wells (not restricted to previous 12 months)*	
Project is to connect new customers with existing contaminated or inadequate sources	40 points

\*Based on best estimate after consultation with local health department.

Source Contamination (only if project replaces the contaminated source. For example, contamination due to salt piles, industrial contamination, underground storage tanks, and dry cleaners. Points not awarded if system already received points in the bacteriological or GWR segments.)	
Project is to replace a contaminated drinking water source, or significant contamination exists within the one year time of travel as delineated by the source water protection program	60 points
Project is to replace a drinking water source with significant contamination within the five year time of travel that is expected to impact the wellfield as delineated by the source water protection program	30 points

Cyanotoxins Source Contamination	
Project is to replace a contaminated drinking water source or modify treatment at an existing water treatment plant where the drinking water source is Impaired. (Impaired: two or more exceedances of cyanotoxin thresholds in raw water at least 30 days apart.)*	60 points
Project is to replace a drinking water source or modify treatment at an existing water treatment plant where the drinking water source is on the Watch List. (Watch List: detection is >50% of cyanotoxin thresholds in raw water.)*	30 points

\*The 2018 Integrated Water Quality Monitoring and Assessment Report identifies which waters are impaired or on a watch list due to cyanotoxins, based on sampling through 2018. Public water systems not listed in the report will also qualify for the cyanotoxin source contamination points if more recent source water sample results meet the impaired or watch list criteria.

PWS Elimination	
Project will eliminate the public water system with a public health issue or under enforcement orders	60 points

Significant Deficiencies	
Project will eliminate a significant deficiency as documented in the most recent sanitary survey or other written correspondence between the Ohio EPA and the system.	25 points

### Continued Compliance with Federal and State Safe Drinking Water Act (SDWA) Requirements

The next category is continued compliance with federal and state SDWA requirements. The condition of the physical infrastructure has been selected as an indicator or predictor of the system’s ability to remain in compliance. The rationale being that without adequate supplies of source water, with inadequate, undersized or deteriorated plants, and with inadequate finished water storage and/or distribution systems, a public water system will be unable to maintain compliance with SDWA requirements. Included in this portion of the evaluation are bonus points to reward systems that are taking steps to stay in compliance with state requirements and to reduce water usage. The following are the points assigned to the specified elements in this category.

Design Deficiencies

Source Quantity	
Adequate	0 points
Shortage during peak day demand	5 points
Shortage during peak season	10 points
Continual shortage	30 points

Source (if not included in Source Contamination section above, and to address a physical construction issue)	
Improper well construction	60 points
Inadequate intake structure	20 points

Plant	
Inadequate back-up power (average day)	10 points
Inadequate process*	5 points
Switching from gas to liquid chlorine**	5 points
No redundancy of critical components***	10 points
Insufficient plant capacity	30 points
Deteriorated plant	30 points

\* Points for each inadequate process; please explain in comments. Processes to be considered are: chemical feed, rapid mix, clarification (flocculation/settling), filtration, disinfection control, aeration/stripping, ion-exchange, corrosion control, and pumping. Maximum - 45 points.

Inadequate processes and insufficient plant capacity projects will require a sufficiency evaluation to determine if operations are optimized prior to ranking.

\*\* Points awarded for switching from gaseous to liquid chlorine may only be awarded if included in the project scope.

\*\*\*Critical components are those which are necessary to treatment and without which, drinking water standards may not be met.

Storage System (select only one)	
Greater than or equal to one day based on design production	0 points
Greater than or equal to one day based on average production but less than 1 day at design production	5 points
Less than one day based on average production	10 points

Distribution System	
Bringing underground storage tank above grade	10 points
Bringing booster station above grade	10 points
Inadequate size	10 points
Looping dead end lines. Not eligible if points given In Disinfection Residual section or the Chronic Contaminants section	10 points
Project includes installation of meters to a public water system at existing connections currently without residential meters	30 points
Deterioration of distribution system components	20 points

### Bonus Points for Effective Management Practices

Bonus points may be obtained by demonstrating effective management practices.

Management Practices	
Emergency generator	5 points
Certified Operator that exceeds minimum staffing requirements	5 points
Endorsed Balanced Growth Plan	5 points
Endorsed Source Water Protection Plan*	5 points
Water conservation program (unaccounted water loss of $\leq 15\%$ )	5 points
Completion of Utility Board/Financial Management training for at least half of Council/Board of Public Affairs	5 points

\*Points are awarded for Ohio EPA Endorsed Source Water Protection Plan or an endorsed Wellhead Protection Management Plan.

## Regionalization

This category is included to support the concept that larger systems are more apt to have managerial, financial and technical capabilities to ensure continued compliance with current and future requirements of both federal and SWDA laws and regulations. Points are given to the applicant of the regionalization loan only. The following elements are considered.

Regionalization guidelines	
Projects which provide the potential for regionalization (existing public water systems which could connect to the project and the project's system maintains adequate capacity to serve them)	10 points
If the project involves the regionalization of more than one community water system or an eligible non-community water system and there is a signed commitment letter to tie in or an ordinance mandating tie-in	10 points per additional system
If the project involves the regionalization of more than one non-community water system (for-profit privately owned public water systems) and there is a signed commitment letter to tie in or an ordinance mandating tie-in	10 points per additional system
If the project will address contaminants to customers of other existing public water systems (i.e. provide water to master metered mobile home park, or satellite systems)	5 points per additional system (max. 30)