



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Ottawa County
Lake Erie Utilities Company
TNC Water System
PWS ID# 6201911

December 15, 2011

Mr. Jim Arvin, President
Lake Erie Utilities Company
P. O. Box 29
Middle Bass, Ohio 43446

Subject: Notice of Violation – Monthly Operating Reports

Dear Mr. Arvin:

This letter is in regards to monthly operating reports for Lake Erie Utilities Company. Reports have been submitted late and have been incomplete and incorrect on multiple occasions.

Ohio Administrative Code (OAC) Rule 3745-83-01(I)(2) states "The operation report shall be signed by the operator in responsible charge designated in accordance with rule 3745-7-02 of the Administrative Code and submitted to the district office no later than the tenth of the month following the month for which the report was prepared."

In violation of OAC Rule 3745-83-01(I)(2), the Water Plant/Distribution System Monthly Operating Reports (EPA Form 5002) were submitted late for the August 2011, September 2011, and October 2011, monitoring periods. The Surface Water Treatment Plant Monthly Operating Reports (EPA Form 5109) were submitted late for the August 2011, and September 2011, monitoring periods. In addition, the August 2011, September 2011, and October 2011, Monthly Operating Reports (EPA Form 5002 and 5109) were not signed by the operator in responsible charge designated in accordance with rule 3745-7-02 of the Administrative Code.

In violation of OAC Rule 3745-81-75(A)(1), Lake Erie Utilities Company failed to correctly report the number of hours filtering on the August 2011, September 2011, and October 2011, monthly operating reports. The monthly operating reports indicate that the filters were in operation 24 hours per day. Plant operators have indicated that the water treatment plant was periodically shut down during these months, therefore, not filtering 24 hours per day as indicated on the monthly operating reports.

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In violation of OAC Rule 3745-83-01 (H) and (I)(1)(a), Lake Erie Utilities Company failed to report the average turbidity for August 16 through August 31, 2011, and failed to correctly report the maximum, minimum and average turbidity for September 25 through September 29, 2011, October 14 through 16, 2011, and October 18 and 19, 2011. In addition, Lake Erie Utilities Company failed to report the minimum and average turbidity values for October 1 and 2, 2011.

In violation of OAC Rule 3745-81-75(A)(2), Lake Erie Utilities Company failed to correctly report the percentage of time the filtered water exceeded the 0.3 NTU standard. The August 2011, September 2011 and October 2011, monthly reports indicate 100 percent compliance with the 0.3 NTU standard, however, this is incorrect based upon recorded values.

In violation of OAC Rule 3745-81-75(A)(3), Lake Erie Utilities Company failed to report the date and duration of each period during the months of August 2011, September 2011, and October 2011, that the turbidity exceeded 0.3 NTU.

In violation of OAC Rule 3745-81-75(C)(4), Lake Erie Utilities Company reported incorrect minimum actual CT values on the August 2011, September 2011, and October 2011, monthly operating reports.

In violation of OAC Rule 3745-81-75(C)(4), Lake Erie Utilities Company reported incorrect effective disinfectant contact time values on the August 2011, September 2011, and October 2011, monthly operating reports.

In violation of OAC Rule 3745-81-75(C)(4), Lake Erie Utilities Company reported incorrect required contact time values on the September 2011, and October 2011, monthly operating reports.

In violation of OAC Rule 3745-81-75(C)(4), Lake Erie Utilities Company failed to report the highest pH, during peak hourly flow on August 31, 2011.

Lake Erie Utilities must review plant operating records and submit revised monthly operating reports immediately. The instructions for completing the EPA form 5109 and EPA form 5002 are enclosed. The revised monthly operating reports must be signed by the operator in responsible charge.

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If you have any questions regarding this letter or any other matter regarding your water system, please feel free to contact me at (419) 373-4118.

Sincerely,



Justin Bowerman
Environmental Specialist 3
Division of Drinking and Ground Waters

/llr

pc: Ottawa County Health Department
Donald Daley, Uni-Tech Environmental (include enclosures)
Pete Schafer
Julie Gillenwater, DDAGW, CO
Toni Buchanan, DDAGW, CO
DDAGW, NWDO File

ec: Brian Tarver, DDAGW, CO
Judy Stottsberry, DDAGW, CO
Paul Brock, DDAGW, NWDO