



Environmental  
Protection Agency

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

Re: Huron County  
Freedom Valley of Huron County LLC  
Transient Public Water System  
PWS ID# OH3946412  
STU ID#3960838

November 23, 2011

Mr. Michael Folkman, Owner  
Freedom Valley of Huron County LLC  
1875 U. S. Route 250 South  
P. O. Box 30  
New London, Ohio 44851-0030

**Subject: Notice of Violation for Failure to Obtain Plan Approval**

Dear Mr. Folkman:

On October 25, 2011, the Ohio Environmental Protection Agency (Ohio EPA) performed a Limited Scope Site Visit (LSSV) at Freedom Valley of Huron County (Freedom Valley) to investigate a complaint. During the LSSV, Ohio EPA representatives noted waterlines with hose connections were extended to at least 12 additional campsites including: 54, 55, 56, 57, 58, 59, 62, 63, 64, 65, 66 and 67. The hose connections located at the additional campsites were not identified by you during a June 30, 2011, sanitary survey conducted of your water system by Ohio EPA.

On November 4, 2011, Ohio EPA sent you an e-mail requesting additional information regarding the sources of water on the Freedom Valley property and the installation of waterlines at your public water system.

On November 14, 2011, Ohio EPA received a response from you to our November 4, 2011, inquiry. Your response included the following information:

- The sole source of water for the public water system is two wells and an underground holding tank which were noted by Ohio EPA during the June 30, 2011 sanitary survey.
- In 2009, you extended waterlines from the existing public water system to 14 additional campsites. You state you were not aware of the need for Ohio EPA approval because the lines were being installed to "dry" campsites. In a letter to the Huron County Health Department attached to your e-mail, you state that it was your intent that the water from these waterlines would be used to fill holding tanks on trailers and would be used for "bathroom use" only.
- A list of materials used in the construction of the waterlines which were extended to the 14 additional campsites.

Mr. Michael Folkman, Owner  
November 23, 2011  
Page 2

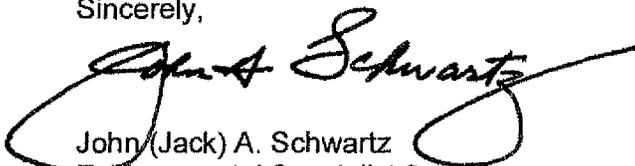
Ohio Administrative Code (OAC) 3745-81-01 (BBBB) states that a "public water system" or 'PWS' means a system which provides water for human consumption through pipes or other constructed conveyances. . ." OAC 3745-81-01 (YY) states that "human consumption" means the ingestion or absorption of water or water vapor as the result of drinking, cooking, dishwashing, hand washing, bathing, showering, or oral hygiene."

Ohio Revised Code (ORC) 6109.07 states, in part, "No person shall begin construction or installation of a public water system, or make a substantial change in a public water system, until plans therefor have been approved by the director of environmental protection under division (A)(1) or (2) of this section." Additionally, OAC 3745-91-02 (A) states that "no person shall begin construction or installation of a public water system, or make a substantial change in a public water system, until plans therefor have been approved by the director of environmental protection..."

Water contained in the holding tanks of trailers can be used for any of the uses described in OAC 3745-81-01 (YY), and therefore, the waterlines you extended to the 14 additional campsites are a part of Freedom Valley's PWS. Installation of those waterlines extended to the 14 additional campsites is a substantial change to your PWS. **Consequently, you are in violation of ORC 6109.07 and OAC 3745-91-02 (A) for installing waterlines to 14 additional campsites on your public water system prior to obtaining approval by the director of environmental protection.**

By December 7, 2011, respond to this Notice of Violation with your proposal to resolve these violations.

Sincerely,



John (Jack) A. Schwartz  
Environmental Specialist 2  
Public Drinking Water Unit  
Division of Drinking and Ground Waters

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Holly Kaloz, DDAGW, CO  
Katie Hernandez, DDAGW, CO  
Huron County Health Department  
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