



**Environmental
Protection Agency**

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



NOTICE OF VIOLATION – ACTION REQUIRED

Re: Ottawa County
Lake Erie Utilities Company
TNC Water System
PWS ID# OH6201911
STU # 6252901

January 23, 2012

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

Subject: Notice of Violation – Failure to meet the treatment technique requirements in rule 3745-81-73 of the Ohio Administrative Code (OAC) – December 2011

Dear Mr. Arvin:

Lake Erie Utilities Company fails to provide slow sand filtration as defined by OAC Rule 3745-81-01 and is therefore in violation of OAC Rule 3745-81-73. OAC Rule 3745-81-73 requires a public water system that uses a surface water source to provide filtration which meets the requirements of conventional or direct filtration treatment, or slow sand filtration as defined by OAC Rule 3745-81-01; or demonstrate to the director that another filtration technology can consistently and reliably achieve ninety-nine per cent (2 log) removal of *Cryptosporidium*, 99.9 per cent (3 log) removal and/or inactivation of *Giardia lamblia* cysts and 99.99 per cent (4 log) removal and/or inactivation of viruses.

OAC Rule 3745-81-01 (MMMM) states, "Slow sand filtration means a process of passing raw water through a porous granular medium, at a rate of less than one hundred fifty gallons per day per square foot of sand area, with substantial removal of particles by physical and biological mechanisms."

Lake Erie Utilities Company feeds calcium hypochlorite prior to slow sand filtration, which deters the process of substantially removing particles through a biological mechanism. Failure to meet any requirement of OAC Rule 3745-81-73 is a treatment technique violation and public notification is required as set forth in OAC Rule 3745-81-32.

Actions required as a result of the above violation	
Step 1	Within 30 days issue the attached public notice of the violation in accordance with rule 3745-81-32 of the Ohio Administrative Code by the following method(s) to reach all persons served by the public water system: Posting the notice in conspicuous locations throughout the distribution system frequented by persons served by the system, or by mail or direct delivery to each customer and service connection (where known). If the public notice is posted, the notice shall remain in place for as long as the violation or situation persists, but in no case for less than seven days, even if the violation or situation is resolved; and Any other method reasonably calculated to reach other persons served by the system if they would not normally be reached by the notice. Such persons may include those served who may not see a posted notice because the posted notice is not in a location they routinely pass by. Other methods may include: publication in a local newspaper or newsletter distributed to customers; use of E-mail to notify employees or students and parents or legal guardians; or delivery of multiple copies in central locations (e.g., community centers).
Step 2	Initiate an investigation and take the necessary steps to correct the problem as soon as possible.
Step 3	Within 10 days of completing Step 1, fill out the attached verification form and send it along with a copy of the public notification issued to the Northwest District Office of Ohio EPA.

If you have any questions regarding this letter, please contact me at (419) 373-4118.

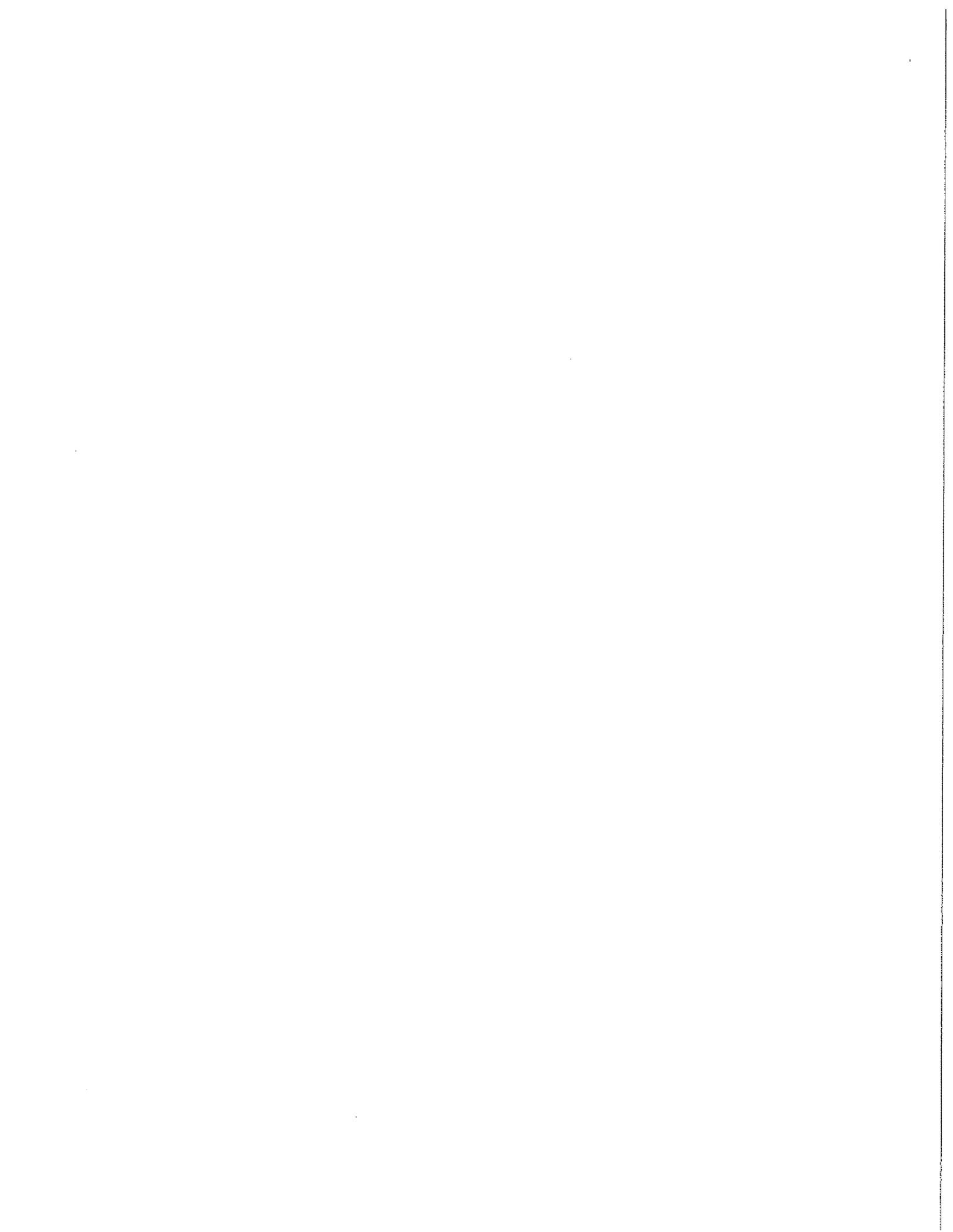
Sincerely,



Justin Bowerman
Environmental Specialist 3
Division of Drinking and Ground Waters

/llr

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



DRINKING WATER NOTICE

Lake Erie Utilities Does Not Meet Treatment Requirements

Lake Erie Utilities Company fails to provide slow sand filtration as defined by OAC Rule 3745-81-01 and is therefore in violation of OAC Rule 3745-81-73. Ohio EPA requires water systems that use a surface water source to provide filtration that meets certain requirements to remove particles from the water. Lake Erie Utilities Company provides slow sand filtration, which relies in part on biological activity to remove particles. Lake Erie Utilities Company feeds calcium hypochlorite prior to slow sand filtration, which deters the process of substantially removing particles through a biological mechanism.

What should I do?

- If you have specific health concerns, consult your doctor. A home filter will not necessarily solve the problem, because not all home filters protect against disease-causing organisms.
- People with severely compromised immune systems, infants, and some elderly people may be at increased risk. These people should seek advice about drinking water from their health care providers.

What does this mean?

This is not an emergency. We do not know of any cases of contamination. However, until improvements are made, there is an increased chance that disease-causing organisms could contaminate the water supply.

Inadequately treated water may contain disease-causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea, and associated headaches. These symptoms, however, are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice.

What is being done?

We are taking the necessary steps to correct the problem as soon as possible.

For more information, please contact _____ at _____ or _____
name of contact phone number mailing address

General guidelines on ways to lessen the risk of infection by microbes are available from the EPA Safe Drinking Water Hotline at 1(800) 426-4791.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

PWSID#: OH6201911 Date distributed: _____

