



**Environmental  
Protection Agency**

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

December 29, 2011

RE: COLUMBIANA COUNTY  
COMMUNITY PUBLIC WATER SYSTEM  
EAST PALESTINE, CITY OF WATER SYSTEM  
PWS ID # OH1500912  
STU ID # 1553399

Mr. Gary Clark, City Manager  
City of East Palestine  
P.O. Box 231  
144 North Market Street  
East Palestine, OH 44413

Dear Mr. Clark:

On November 29, 2011, I conducted a sanitary survey of the above referenced public water system. Mr. John Jurjavcic and Mr. Denny Griffith were interviewed and the water system was inspected in their presence.

The purpose of the evaluation is to determine the ability of the facility to provide adequate, safe and potable water that meets the requirements of the Ohio Administrative Code (OAC). The eight major elements that are generally reviewed during a sanitary survey include: source, treatment, distribution system, finished water storage, pumps/pump facilities and controls, monitoring/reporting/data verification, water system management/operation, and operator compliance with State requirements. General supervision of the operation and maintenance of public water systems is a function of this Agency as set forth in Chapter 6109 of the Ohio Revised Code.

Identified below are regulatory requirements necessary for compliance and recommendations made to optimize operations or to reduce the potential for future violations or contamination. The following sections are the result of findings discussed during the evaluation or documented in the attached Sanitary Survey Evaluation Report.

## REQUIREMENTS

The last inspection report, dated December 31, 2008, noted several required items. The following is a list of those requirements and a notation as to whether they have or have not been adequately addressed.

1. As documented in past site visits, the "flexible roof" covering the Wheathill Reservoir is in a condition which this agency believes may cause a threat to health and safety. The possible hazards associated with the roof were again discussed. It appears that there could be the possibility of severe dangers if animals or humans were to fall onto the roof, not to mention the obvious problems associated with the stagnant water being

introduced into the water system if a tear in the liner occurs. In addition, there must be a safe and easily attainable access to the reservoir for basic inspection.

**Standing water on the roof of the reservoir has been observed during each of the site visits. The flexible roof drainage system is not operational. Due to the severe health and safety concerns with the "flexible roof", the roof issues must be addressed immediately.**

During the meeting, it was emphasized that Detail Plans for the new structure must be submitted and approved. The new structure must meet the Recommended Standards For Water Works - 2007 Edition (7.0.10) which states, "The roof and sidewalls of all water storage structures must be watertight with no openings except properly constructed vents, manholes, overflows, risers, drains, pump mountings, control ports, or piping for inflow and outflow. Particular attention shall be given to the sealing of roof structures which are not integral to the tank body." In addition to the roof structure, this agency also has concerns with the integrity of the walls of the structure once the rubber liner is removed. The existing structure must be inspected and determined water tight prior to its use.

**Due to the age and the unknown condition of the Wheathill reservoir, it is strongly recommended that the City construct a new water tower and properly abandon the existing structure. As discussed, within the next 30 days please send documentation to this office with the City's plan to address this health hazard and a time frame for implementation. The condition of the Wheathill Reservoir is considered a "significant deficiency." Corrective actions must be completed within 120 days of this letter.**

2. In the previous survey, the location of the Stacey Howell Pump Station was discussed. The access was located in the middle of the road. **A new pump station has been constructed with auxiliary power and is located above grade in a secured location.**
3. OAC Rule 3745-83-01 (E) states, "Community water systems shall maintain a minimum pressure of twenty pounds per square inch(20 psi) gauge at ground level at all points in the distribution system under all conditions of flow other than conditions caused by line breaks, extreme fire flows, or other extraordinary circumstances." **It was discussed that the Jim Town Road project has been completed.**

The following requirements were discussed during this survey:

4. It was discussed that the Harding Well #1 was out of service and that the City was investigating drilling a new well near that site. Attached is the Well Site Application. If

the City plans on drilling a new well, please return the completed application to this office. I will return for a site visit and then the City can drill the well. Once the well is drilled, a complete well analysis will be required. Then detail plans must be submitted and approved by this office prior to its use.

**Per Ohio Administrative Code rule 3745-81-60(D), a public water system must respond, in writing, within 30 days, indicating how and on what schedule the system will address the above items.**

### RECOMMENDATIONS

The following deficiencies are not regulatory violations, but are actions that are recommended by this Agency for optimum operation and to reduce the potential for future violations or contamination:

1. It is recommended that all chemical feeders be calibrated to ensure consistent feed rates. The Recommended Standards For Water Works - 2007 Edition 5.0.3(a) states that "feeders will be able to supply, at all times, the necessary amounts of chemicals at an accurate rate, throughout the range of feed."
2. Lighting in the treatment building has been a topic of concern over the past several meetings. The existing lighting is corroded and several of the bulbs are not operational. The lighting also presents a potential fire hazard. It is recommended that proper new lighting be installed in the water treatment building to provide water plant personnel with lighting which is sufficient to operate the water plant and to eliminate the associated hazards.
3. It was discussed that several brackets throughout the water treatment building which hold chemical feed lines have corroded and can no longer secure the lines. These should be replaced in a timely manner to ensure the integrity of the feed lines is protected.
4. It was discuss that one of the three H.S. Pumps must be rebuilt. Please perform this maintenance to ensure that the City has proper redundancy of its H.S. pumps.
5. Please be reminded that AWWA D101-53, Section A-1.1 states every steel water storage tank, standpipe or reservoir should be carefully inspected prior to repair and /or repainting and at any time when leakage or some other apparent deterioration is observed. In any event, all water tanks including the clearwell should be thoroughly inspected at intervals of not more than five (5) years.

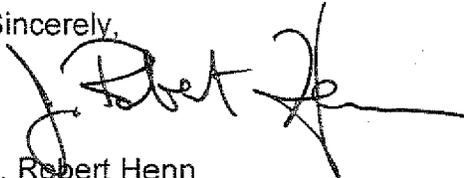
At this time of the survey the Moore Lane Standpipe was observed. It was discussed that the tank was painted in 2006-2007 and was inspected again in 2011. The tank

appears to be in good condition; however the ring wall at the base of the tank still must be re-grouted. Lastly, the overflow pipe is connected to the City storm drain. The Overflow pipe must have an air gap and be properly screened to prevent contaminants from entering the finished water system.

6. Some of the many responsibilities of maintaining a distribution system include regular hydrant flushing, exercising of valves, maintaining backflow prevention and meter replacement programs, tank maintenance and repair, and maintaining good records. It was discussed that the age of the City's distribution system is of concern. It is recommended that a hydraulic model of the distribution system be developed in order to give an accurate depiction for future planning. Funding should be set aside to begin a Comprehensive Distribution Planning Strategy in order to perform Distribution preventative maintenance and replacement.

Please note that additional information concerning existing and upcoming drinking water regulations and requirements can be obtained from our Web site at [www.epa.ohio.gov](http://www.epa.ohio.gov). If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me at (330) 963-1248.

Sincerely,



J. Robert Henn  
Environmental Specialist II  
Division of Drinking and Ground Waters

JRH/ams

cc: Ohio EPA, Central Office, DDAGW / OFAS  
Columbiana County Health Department  
John Jurjavcic, Superintendent, City of East Palestine