



Environmental
Protection Agency

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



CERTIFIED MAIL # 91 7108 2133 3932 4449 1905

March 7, 2011

Re: **Franklin County
Community Gardens MHP
Community Water System
PWS ID: 2500512**

Louis Devault
Owner
Community Gardens Mobile Home Park
6244 London-Groveport Road
Grove City, OH 43123

Dear Mr. Devault:

During the week of February 20, 2011, I made several attempts to set up an appointment to survey the Community Gardens MHP public water system. I spoke directly to you and Suzanne Mates and left phone and e-mail messages with Sandra McCoy. Each of you indicated you were unavailable indefinitely and each of you directed me to contact the other two. As a result, I visited the park alone on February 28, 2011. It is important to inform you of my findings and to identify several issues for which Community Gardens MHP is in violation of the Ohio Administrative Code (OAC). We request a schedule for returning to compliance with each violation by no later than March 31, 2011.

1. OAC 3745-81-61. Community groundwater system must undergo a sanitary survey at least every five years. The last survey was performed in August, 2005. Public water systems are responsible for ensuring that the required sanitary surveys are performed. Contact me to set up an appointment to survey the park. I can be reached by telephone at (614) 728-3864 or by email at Carolyn.oneal@epa.state.oh.us.
2. OAC 3745-9-04(A)(4), OAC 3745-9-05(O). Ponding within a 50 ft radius of a well is prohibited. Build up the ground within a 50 ft radius of Well #4 to eliminate ponding. Well casing height above finished grade shall be at least 12 inches. Extend the casing as needed to ensure it extends at least 12 inches above surrounding ground. (see photo)
3. OAC 3745-91-02(A), OAC 3745-91-09(A)(1)(2). On February 10, 2010, Well #4 was approved for emergency use only under the condition that either the park ties into Franklin County within 30 days of water becoming available OR, detail plans for iron and manganese removal would be submitted, installed and operated. Since Franklin County did not install water lines (currently, there continues to be no known date for water line installation in front of the park),

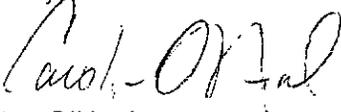
Central District Office
50 West Town Street, Suite 700
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plans were required to have been submitted by August 10, 2010 and operated by December 10, 2010. Neither has been done and we understand Well #4 is being operated. Provide a time schedule for submittal of plans for iron and manganese removal.

4. OAC 3745-83-01(C)(1), OAC 3745-7-09(B). Community Gardens is in violation for failure to maintain satisfactory chlorine residual levels in January, 2011. A chlorine residual level of at least 0.2 mg/L or 1.0 mg/L combined must be maintained throughout the park. The January 2011 monthly report shows daily chlorine residual levels below the minimum required level for 21 days. It is your responsibility as the owner and Operator of Record to ensure the water treatment equipment is in good working order. Provide the name and number of the resident in the park who can check the water plant on short notice when it becomes necessary.
5. OAC 3745-7-03(C), OAC 3745-7-09(A)(B)(C). Community Gardens MHP is designated as a Class A public water system which requires an Operator of Record with at least a Class A water license. Our records indicate you are the Operator of Record. As such, the water system must be staffed 2 days per week for a minimum of 1.0 hour weekly. A written log must be maintained of the arrival and departure times of the Operator of Record and all activities performed related to the water system. The log must be accessible onsite for 24 hour inspection by agency or emergency response personnel. Submit copies of the records showing arrival and departure times and routine or preventive maintenance activities since January 2010.
6. OAC 3745-83-01. The new version of the Monthly Report must be used to report daily production and free chlorine residual levels at the plant tap and in the distribution system. Attached is the two page document. Make copies as needed.

Sincerely,



Carolyn O'Neal
Environmental Specialist III
Division of Drinking and Ground Waters
Central District Office

Enclosure: Photo of Well #4, Plant/Distribution MOR

c: Sandra McCoy, Owner, Community Gardens.MHP
Suzanne Mates, Owner
Franklin County Health Department
Enforcement, DDAGW/CO
CDO File