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State of Ohio Environmental Protection Agency

Central District Office

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Columbus, OH 43216-1049**CERTIFIED MAIL # 91 7108 2133 3932 4450 7811**

October 18, 2007

**Re: Pickaway County
Village of South Bloomfield
Community Water System
PWSID: 6502112
STUID: 6557184**Mr. Mike Cline, Chairman
Board of Public Affairs
Village of South Bloomfield
5023 South Union Street
South Bloomfield, OH 43103**Re: COMPLIANCE AND OPERATIONAL REVIEW MEETING**

Dear Mr. Cline:

On October 9, 2007, we met to discuss the ongoing violations and deficiencies for the South Bloomfield public water system. The purpose of this meeting was to review the system's violations and deficiencies, establish action items and a schedule to return the system to compliance.

Violations

As discussed in our meeting, the Village of South Bloomfield is in violation of the Ohio Administrative Code Chapter 3745 as follows:

1. In accordance with Ohio Administrative Code (OAC) 3745-7-02 (A)(1), the owner of a public water system must notify the director when there is a change in the operator of record and that the notification is to be made within three days of when the change occurs. In violation of OAC 3745-7-02(A)(1), the Village lost the services of its operator of record, Mr. Wilford Gartin, beginning on July 17, 2007. The Village did not notify Ohio EPA until September 5, 2007.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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2. In accordance with OAC 3745-7-02(D), the owner of a public water system may enter into a contract for the services of one or more appropriately certified operators to serve as the operator of record. The Village was in violation of OAC 3745-7-02(D), from July 17, 2007, through October 15, 2007. A signed contract that met the requirements of OAC 3745-7-02(D) between the Village and Environmental Engineering Services was submitted to Ohio EPA on October 15, 2007.
3. In accordance with OAC 3745-7-03, the public water system shall maintain the same level of classification and staffing as that on the effective date of this rule (12/21/06) until such time as a substantial change to the public water system is approved in accordance with Chapter 3745-91 of the Administrative Code or until July 1, 2009, whichever date is earlier. The Village was in violation of OAC 3745-7-03, from July 17, 2007 through October 15, 2007. It was agreed that Environmental Engineering Services will provide over site of the water system for a minimum of ten hours over no less than three days per week.
4. In accordance with OAC 3745-7-09(A)(3), the owner and operator of record of a public water system will maintain or cause to be maintained operation and maintenance records for the public water system. The Village was in violation of OAC 3745-7-09 (A)(3) from December 21, 2006 through October 15, 2007, for failing to maintain adequate records. During an Ohio EPA inspection conducted on September 5, 2007, the only operational records provided were on clip boards that showed two entries. The two entries were made on July 24, 2007 and September 3, 2007.
5. In accordance with OAC 3745-83-01, a public water system is required to maintain daily a free chlorine residual of 0.2 mg/L or a combined chlorine residual of 1.0 mg/L in the distribution system at all times. In violation of OAC 3745-83-01, the Village failed to maintain adequate chlorine residuals for seven (7) days in July 2007 and two (2) days in August 2007.
6. In accordance with OAC 3745-83-01(I)(1), a public water system is to submit monthly operating reports. The Village was in violation of OAC 3745-83-01(I)(1) for failure to submit Ohio EPA form 5001 for August 2007.
7. In accordance with OAC 3745-83-01(I)(2), operational reports shall be signed by the operator of record designated in accordance with rule 3745-7-02 of the Administrative Code. The Village was in violation of OAC

3745-83-01(I)(2) for signing and pinning the monthly operational reports for July 2007 and August 2007 using Mr. Wilford Gartin's name. Mr. Gartin had not worked at the treatment facility since July 17, 2007.

8. In accordance with OAC 3745-83-01(I)(3), the discovery of any serious plant breakdown or condition causing or likely to cause any of the following items must be reported to the district office as soon as possible, but within 24 hours:
 - (a) Any discharge of water not in accordance with section 6109. of the Revised Code or the rules adopted thereunder;
 - (b) Any major interruption in service or disinfection; or
 - (c) Any hazard for employees, consumers, the public, or the environment.

The Village was in violation of OAC 3745-83-01(I)(3) for failing to report to the district office the pink water discoloration within the Village's distribution system on September 1, 2007. Ohio EPA was not notified by the Village, but rather by a South Bloomfield resident inquiring about the safety of their drinking water on September 5, 2007.

9. In accordance with OAC 3745-81-21(A)(1)(a), the Village is required to collect two total coliform samples per month. In violation of 3745-81-21(A)(1)(a), the Village failed to collect any samples in August 2007.
10. In accordance with OAC 3745-91-08(G) (1), *"No person shall construct or install a public water system, or make any substantial change in a public water system, as defined in rule 3745-91-01(G) of the Administrative Code, that is not in accordance with plans approved by the director"*. In violation of OAC 3745-91-08(G)(1), the Village failed to submit plans including a sieve analysis to Ohio EPA when the filter media in the iron filters was replaced in April 2007.
11. In accordance with OAC 3745-81-32(B)(1), the owner or operator of a public water system with any situation that may pose an acute risk to human health must notify the persons served by the public water system. OAC 3745-81-32(B)(2)(a) requires the public water system to provide a public notice as soon as practical but no later than 24 hours after the system learns of the situation. In violation of OAC 3745-81-32(B)(1), the Village failed to properly public notice the pink water event that occurred

on September 1, 2007. An adequate notification was not released by the Village until September 11, 2007.

Action Items Schedule

Ohio EPA has concerns about the violations and deficiencies discussed during our meeting. The level of noncompliance poses an unacceptable risk to public health and must be addressed. In order to return to compliance, you have agreed to the following:

1. Provide a signed contract with Environmental Engineering Services (EES) that meets the requirements of OAC 3745 by October 12, 2007. An acceptable signed contract was submitted to Ohio EPA on October 15, 2007. The contract specifies coverage from September 1 through December 31, 2007.
2. Due to the agreement to allow Robert Thompson, a Village employee, to perform operations at the treatment facility when an operator of record is not present, EES has agreed to submit the following written operating protocols by October 23, 2007:
 1. Iron filter backwash
 2. Softener regeneration
3. Provide a bound operational log book and keep it at the water treatment plant by October 12, 2007.
4. Provide calibration results and specifications of the Stenner pumps that are used to feed the sodium permanganate. According to October 9, 2007 correspondence from the Village, the operating personnel were checking the output of the pumps against desired dosage rates, but failed to record the information. Per the daily operations protocol submitted during the CORM meeting, the feed pumps are to be calibrated every Monday and Wednesday. This information is to be documented in the operational log.
5. Provide documentation of the current well outputs. According to information submitted during the CORM, the current well outputs are as follows: well 1 is pumping at 167 gpm; and well 2 is pumping at 185 gpm. According to our records, both wells have approved capacities of 140 gpm each. Both wells are currently pumping in excess of their approved capacities. The Village is not permitted to pump the wells over their rated capacities.

6. Provide the sieve analysis on the filter media that was installed in April 2007. According to the information submitted during the CORM, the sieve analysis of the media meets the standards of what was installed in the original December 3, 1997 plan approval.
7. Provide documentation of the iron and manganese concentrations in each well. According to information submitted during the CORM, the iron and manganese levels in the wells are as follows:

Well 1- iron= 1.92 mg/L; manganese= <0.03 mg/l
Well 2- iron= 2.19 mg/L; manganese= <0.03 mg/L
8. Provide a written standard of operation for pink water events by October 23, 2007. This should include notification procedures to the public and Ohio EPA, treatment operational changes and distribution flushing.

Additional Concerns and Recommendations

1. The operations contract between the Village of South Bloomfield and Environmental Engineering Services terminates at the end 2007. The Village needs to be proactive about hiring a permanent certified operator to oversee the water treatment facility before the end of the year.
2. The Village will not be able to increase the current capacity of the water treatment plant until additional sources of water are found. The current wellfield is not able to be expanded. The Village needs to make a decision about finding additional sources of water by either purchasing additional land for a new wellfield or connecting to an existing public water system.
3. The Village is encouraged to contact the Village of Ashville about procuring an emergency interconnection. An interconnection will provide an alternate source in case of drought, contamination or fire emergency.
4. The Village should continue moving forward on adopting a water conservation policy or program. Water conservation tactics improve upon water efficiency which in turn reduces demand.

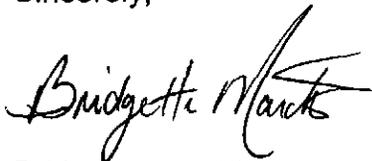
I will be conducting a sanitary survey at your public water system in November 2007. I will also be making periodic site visits to monitor the operations at the treatment facility. Continued noncompliance may result in Ohio EPA taking enforcement action. If an

Mr. Mike Cline, Chairman
Village of South Bloomfield
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enforcement action is necessary, potential consequences may include penalties and loss of licensures. Ohio EPA is authorized under Revised Code chapter 6109.33 to assess penalties up to \$25,000.00 per day per violation.

If you have any questions regarding the content of this letter, please contact me at 614-728-3870.

Sincerely,



Bridgette Marchio
Environmental Specialist
Division of Drinking and Ground Waters
Central District Office

c: Pickaway County Health Department
Albert Roese, Mayor, Village of South Bloomfield
Environmental Engineering Services, Inc.
Todd Kelleher, DDAGW, CAS/CO