



**Environmental
Protection Agency**

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

April 26, 2012

RE: ASHTABULA COUNTY
DFC MOBILE HOME PARK
COMMUNITY PUBLIC WATER SYSTEM
PWS ID # OH0400512

Lois Adkins
DFC Mobile Home Park
1600 Lenox-New Lyme Road
Jefferson, Ohio 44047

CERTIFIED MAIL

Dear Ms. Adkins:

The Ohio EPA has identified a significant deficiency within the DFC Mobile Home Park potable water system that must be corrected within 30 days. A significant deficiency is defined in Rule 3745-81-43(A)(4) of the Ohio Administrative Code (OAC). The deficiency was documented in a site visit letter dated September 1, 2011, in a survey letter dated October 31, 2011 and in a follow-up letter dated January 23, 2012.

During site visits by Ohio EPA personnel on August 23, 2011 and October 6, 2011, the 4000 gallon raw water storage tank was determined to be a potential source of bacteriological contamination to the water system. The tank must be inspected and corrections made to any deficiencies identified by the inspection. In accordance with Rule 3745-81-60(F) of the OAC, we are requiring that corrections be made within 30 days of the date of this letter. Requests to have the tank inspected and corrected were communicated in the correspondence referenced above.

In addition to this significant deficiency, DFC Mobile Home Park continues to be in violation of other Ohio EPA regulations as follows:

1. OAC 3745-7-02 CERTIFIED OPERATOR REQUIRED (VIOLATION) – DFC Mobile Home Park is in violation of the stated rule for failure to designate an Operator of Record to oversee the operation of the water system. The Operator of Record must have a valid certification of a class equal to or greater than the classification of the public water system (Class A).
2. OAC 3745-81-21 COLIFORM MONITORING REQUIREMENTS (VIOLATION) – DFC Mobile Home Park is in violation of the stated rule for failure to develop a written total coliform bacteria sample siting plan which documents how coliform samples will be collected, handled and processed.
3. OAC 3745-81-27(C)(1)(a) DPD CHLORINE TEST KIT (VIOLATION) – DFC Mobile Home Park is in violation of the stated rule for failure to use a DPD colorimetric digital test kit to monitor chlorine residual in the distribution system.

4. OAC 3745-82-32 PUBLIC NOTIFICATION (VIOLATION) – DFC Mobile Home Park is in violation of the stated rule for failing to provide notices concerning violations to public water system customers and verification of such notification to the Ohio EPA concerning the following periods of non-compliance in sampling as follows:
 - a. Nitrate (failure to monitor) – January to March, 2009
 - b. Total Coliform (positive samples) – February 2009
 - c. Total Coliform (failure to monitor) – March 2009, June 2011
 - d. Source Water (failure to monitor) – May 2010
 - e. Lead and Copper (failure to monitor) – 2010
5. OAC 3745-83-01 OPERATIONAL REQUIREMENTS (VIOLATION) – DFC Mobile Home Park is in violation of the stated rule for failure to collect daily operational data (plant flow, plant tap free or combined chlorine residual, distribution system free or combined chlorine residual) and report it on a monthly basis to the Ohio EPA through the submission of a monthly operating report form.
6. OAC 3745-83-01(C)(1) DISINFECTION (VIOLATION) - DFC Mobile Home Park is in violation of the stated rule for failure to maintain a minimum required free or combined chlorine residual in the distribution system.
7. OAC 3745-85-01 CONTINGENCY PLANS (VIOLATION) – DFC Mobile Home Park is in violation of the stated rule for failure to develop a written contingency plan which documents how safe drinking water will be provided to the service area under emergency conditions.

Immediate attention to all listed violations and requirements is needed. Please submit documentation to this office that you have addressed the significant deficiency, in addition to the other violations as noted above.

Respectfully,



Stephen Bopple, P.E.
Environmental Engineer
Division of Drinking and Ground Waters

SB/ams

cc: Ohio EPA, Central Office, DDAGW / OFAS
Ashtabua County Health Department
ec: Daniel Underwood, P.E., Engineering Supervisor, Ohio EPA, NEDO, DDAGW
Stivo DiFranco, Enforcement Supervisor, Ohio EPA, NEDO, DDAGW
David Maschak, Compliance Coordinator, Ohio EPA, NEDO, DDAGW