



**Environmental
Protection Agency**

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



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NOTICE OF VIOLATION – ACTION REQUIRED

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

June 6, 2012

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

Subject: Notice of Violation – Monthly Operating Reports

Dear Mr. Arvin:

This letter is in regards to monthly operating reports for Lake Erie Utilities Company. Reports have been submitted late and have been incomplete and incorrect on multiple occasions.

Ohio Administrative Code (OAC) Rule 3745-83-01(I)(2) states "The operation report shall be signed by the operator in responsible charge designated in accordance with rule 3745-7-02 of the Administrative Code and submitted to the district office no later than the tenth of the month following the month for which the report was prepared."

In violation of OAC Rule 3745-83-01(I)(2), the Water Plant/Distribution System Monthly Operating Reports (EPA Form 5002) and the Surface Water Treatment Plant Monthly Operating Reports (EPA Form 5109) were submitted late for the January 2012, and February 2012, monitoring periods.

In violation of OAC Rule 3745-81-75(A)(2), Lake Erie Utilities Company failed to correctly report the percentage of time the filtered water exceeded the 0.3 NTU standard for the April 2012, monitoring period.

The March 2012, monthly operating reports (EPA Form 5002 and EPA Form 5109) were initially submitted on April 9, 2012. There were multiple errors on the reports.

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

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www.epa.ohio.gov

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The plant tap chlorine residual was blank, the lowest residual disinfection at the entrance to the distribution system was incorrect, the effective disinfectant contact time was incorrect for March 3, 2012, the minimum actual CT was incorrect for March 1, 2012, March 21, 2012, and March 27, 2012, and the total hours filtering was blank. The errors on the March 2012, monthly operating reports were discussed with Don Daley.

Revised monthly operating reports for March 2012, were submitted on April 16, 2012. In violation of OAC Rule 3745-83-01(I)(1)(a), Lake Erie Utilities Company failed to report the total hours filtering on the revised March 2012, monthly operating report.

Revised surface water treatment plant monthly operating reports (EPA Form 5109) for November 2011, and December 2011, were received on April 26, 2012. In violation of OAC Rule 3745-81-75(A), Lake Erie Utilities Company failed to report filtered water turbidity determinations on the revised November 2011, monthly operating report for November 2, 3, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 29 and 30. In addition, Lake Erie Utilities Company failed to report filtered water turbidity determinations on the revised December 2011, monthly operating report for December 1, 3, 20, 23 and 26.

The logbook entries for November 2, 2011, indicate "On Line 0900 – 1600". The logbook entries for November 5, 2011, indicate "Back on line". The logbook entries for November 18, 2011, indicate "Turn plant on". The logbook entries on November 29, 2011, indicate "Shut plant off 0930". Logbook entries for November 30, 2011, indicate "Turn plant on 1430".

In violation of OAC Rule 3745-83-01(I)(1)(A), Lake Erie Utilities Company failed to report the total hours filtering on the revised November 2011, MOR for November 2, 5, 18, 29 and 30. In violation of OAC Rule 3745-81-75(C)(1), Lake Erie Utilities Company failed to report the lowest residual disinfectant concentration in milligrams per liter in water entering the distribution system on November 2, 5, 18, 29 and 30. In violation of OAC Rule 3745-81-75(C)(4), Lake Erie Utilities Company failed to report the CT parameters during the peak hourly flow rate for November 2, 5, 18, 29 and 30.

A revised surface water treatment plant monthly operating report (EPA Form 5109) for October 2011, was submitted on April 16, 2012. In violation of OAC Rule 3745-83-01(I)(1)(a), Lake Erie Utilities Company failed to report the total hours filtering on the revised October 2011, monthly operating report.

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A revised surface water treatment plant monthly operating report (EPA form 5109) for September 2011, was submitted on April 26, 2011. In violation of OAC Rule 3745-81-75(C)(4), Lake Erie Utilities Company reported incorrect required contact time values for September 29, 2011.

In violation of OAC Rule 3745-83-01 (H) and (I)(1)(a), Lake Erie Utilities Company failed to correctly report the maximum, minimum and average turbidity for September 25 through September 29, 2011.

Lake Erie Utilities must review plant operating records and submit revised monthly operating reports for September 2011, October 2011, November 2011, December 2011, March 2012, and April 2012, immediately. The instructions for completing the EPA form 5109 and EPA form 5002 are enclosed. The revised monthly operating reports must be signed by the operator in responsible charge.

If you have any questions regarding this letter or any other matter regarding your water system, please feel free to contact me at (419) 373-4118.

Sincerely,



Justin Bowerman
Environmental Specialist 3
Division of Drinking and Ground Waters

/cg

Enclosures

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

ec: Andy Barienbrock, DDAGW, CO

