



**Environmental  
Protection Agency**

John E. Seibert, Governor  
Mike DeWine, Lt. Governor  
Scott D. Moegling, Director

**NOTICE OF VIOLATION – FAILURE TO  
CONSTRUCT AND MONITOR IN  
ACCORDANCE WITH DETAIL PLAN  
APPROVAL**

August 20, 2012

RE: SUMMIT COUNTY  
INTERVAL BROTHERHOOD HOME MULTI-  
PURPOSE ROOM  
TNC PUBLIC WATER SYSTEM  
PWS ID # OH7792212  
PLAN APPLICATION No. 868555-ws

Mr. Ralph G. DeVoe  
Operator in Responsible Charge  
Interval Brotherhood Home Multi-Purpose Building  
3445 South Main Street  
Akron, Ohio 44319

**Subject: Lead and Copper Corrosion Control Treatment**

Dear Mr. DeVoe:

This letter serves as a Notice of Violation of Ohio Revised Code (ORC) 6109.07 and Ohio Administrative Code (OAC) 3745-91-02 for failing to construct improvements to a public water system and provide follow-up monitoring requirements as required through detail plan approval. Specifically, detail plans for an ortho/polyphosphate feed system were approved by the Director of Ohio EPA on February 15, 2011 (reference plan application number 781195-ws). Special conditions were required, as summarized at the end of the technical report for the detail plan approval. These improvements were not operational as required (special condition number 1) and follow-up monitoring and reporting for orthophosphate was not done every two weeks as required (special condition number 2). As a result, optimal water quality control parameters for corrosion control could not be designated as required (special condition number 3).

Recent conversations between IBH and this office revealed the system is no longer a NTNC water system due to changes in facility usage at the Multi-Purpose building. As a result, Ursula Musselman of this office issued a letter of reclassification on July 26, 2012. Pursuant to that letter, lead and copper monitoring and corrosion control treatment are no longer applicable for the IBH Multi-Purpose Room public water system. As such, corrosion control regulations no longer apply. However, the above violations were still incurred while the regulations applied to IBH Multi-Purpose Room public water system. The violations will still be part of the IBH Multi-Purpose Room public water system public record.

If you have any questions about this letter, please contact me at (330) 963-1277.

Sincerely,

Scott D. Moegling, P.E.  
Environmental Specialist 3  
Division of Drinking and Ground Waters

cc: Summit County Health District  
Kim Ethers, Ohio EPA, NEDO, DDAGW  
Ursula Musselman, Ohio EPA, NEDO, DDAGW  
Compliance Assurance Section, Ohio EPA, Central Office, DDAGW

SDM/ams