



**Environmental
Protection Agency**

John E. Kasich, Governor
Mary Taylor, Lt. Governor
Scott L. Lilly, Director



NOTICE OF VIOLATION – ACTION REQUIRED

September 10, 2012

Re: **Pickaway County
USACE Visitor Center & Dam Park
Transient Noncommunity
Public Water Systems
PWS ID's: 6537212 & 6537312
STU ID's: 6557224 & 6557225**

Bonnie Maki
USACE Office
21897 Deercreek Road
Mount Sterling, OH 43143

Dear Ms. Maki:

The Public Water Systems serving the USACE Visitor Center and the USACE Dam Park are in violation of the Ohio Administrative Code (OAC) for:

Failure to respond in Writing within 30 days

This letter is notification that the USACE's Visitor Center & Dam Park PWS's at Deer Creek have not complied with requirements issued during this Agency's last surveys performed on May 30, 2012, in violation of rule 3745-81-60 of the Ohio Administrative Code. The PWS's were notified in correspondence dated June 27, 2012 to respond in writing no later than 30 days, with time frames for:

1. Fill out the attached Bacteriological Sample Siting Plans for both facilities. Implement the plans if necessary and maintain them on site. Send this office a copy of the first page of the two plans. This was a requirement outlined in previous survey letters to you.
2. You will need to begin to submit Monthly Operating Reports (MOR's) for both facilities. Use the form found at:
http://www.epa.ohio.gov/portals/28/documents/reporting/DailyMOR_Paper.pdf
Instructions are at:
http://www.epa.ohio.gov/portals/28/documents/reporting/DailyMOR_Instructions_5002.pdf
Please file the reports electronically at:
<http://www.epa.ohio.gov/ddagw/reporting.aspx>
Call Brian Tarver with any questions about electronic filing at 614-728-1740. Electronic submission will soon be required.

Central District Office
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 728 3778
614 | 728 3898 (fax)
www.epa.ohio.gov

The following needs to be entered on each MOR at the Visitors Center/Office: free or combined chlorine at either the entry point (first tap after treatment) or in the distribution area for a total of one sample daily. For the MOR at the Dam Park Public Water System (PWS), the following needs to be entered on each report: free or combined chlorine at both the entry point (first tap after treatment) and in the distribution area for a total of two samples daily. These samples to be taken each day water is available and must be done using a digital DPD colorimetric chlorine test kit with a .1mg/l detection limit. You will also need to provide total throughput on the MOR's based on water meter readings.

The MOR's are due on the tenth of the following month.

I've enclosed a catalogue sheet showing an example of an acceptable DPD meter, I suggest shopping for one that best suits your needs. Many can be found online at: <http://www.usabluebook.com/>

The LaMotte observed at the visitor's center appears to meet this rule, however, you must confirm that the detection limit for chlorine residuals is at least .1mg/l. I suggest placing meters at both of your public water systems. Ensure the meters are kept calibrated per the manufacturer's specifications.

This rule recently changed. In order to stay on top of future rule changes, consider subscribing to our electronic mailing lists if you haven't done so already at:

<http://www.epa.ohio.gov/ddagw/listserv.aspx>

3. Display your License to Operate (LTO) for your two public water systems in a prominent location that is easily viewed by the public.
4. Protect the well heads at both public water systems with the use of bumper posts or boulders to prevent damage from equipment. Trailers are parked adjacent to the well at the Visitors Center and a dent was observed in the hot house surrounding the well at the Dam Park.
5. Provide secondary containment for the chlorine day tanks at both public water systems.
6. Screen the vent on the well at the Visitors Center.
7. The chlorine pump in use at the Visitors Center was not operating in the middle third of its range, it was close to 90% of capacity. Diluting the Chlorox disinfectant with less water is suggested. You can also employ a larger pump or buy disinfectant with a higher percentage of sodium hypochlorite.

8. Repair the chlorine injection point at the Visitors Center to prevent further leaking.
9. Install a gauge on the second pressure tank at the Visitors Center.
10. Ensure the use of NSF or ANSI salt in the brine tank of the softener at the Visitors Center. Confirm with your supplier or look for the logos on the containers.
11. Place the fourth retention tank back into service at the Visitors Center to ensure proper contact time with the disinfectant. This is part of your formal plan approval for the disinfection system. You do not need to go through the plan approval process if you replace the tank with one of like design and size.
12. Keep the lid installed properly on the chlorine day tank at the Dam Park public water system, the chlorine pickup tubing was observed entering the tank at the filler lid and the lid was ajar as a result. The tank must be kept properly covered to prevent the entry of contaminants. Consider drilling a hole in the tank and employing the use of a rubber grommet to ensure the pickup tubing is secure and the tank remains covered.

Regarding item number two above, a Kevin Osbourne of the USACE contacted me via phone on September 4 and indicated they would not be starting MOR's until September, and that was only if a decision was made to leave them installed. We do not require that the two PWS's chlorinate, only that they monitor and report the residual chlorine concentrations if in fact the systems continue to chlorinate.

If you have any questions please contact your Ohio EPA representative at 614 728 3871 or via email at mark.boden@epa.state.oh.us.

Sincerely,



Mark Boden
Environmental Specialist
Division of Drinking and Ground Waters
Central District Office

ec: CDO/DDAGW AA (State Violation)
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