



Environmental
Protection Agency

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

QH0637912

V H ALLMAN SUBDIVISION

11/4/2011



Re: Auglaize County
Community PWS
V.H. Allman Subdivision
PWS ID# OH 0637912
STU ID# 662359

November 4, 2011

Mrs. Becky Knutzen
V. H. Allman Subdivision
11470 East Drive
St. Marys, Ohio 45885-9543

Dear Mrs. Knutzen:

Subject: Notice of Violation for Failure to Respond to a Significant Deficiency

This letter is notification that the V.H. Allman Subdivision public water system has not complied with requirements issued during this Agency's last survey performed on August 25, 2011, in violation of rule 3745-81-60 of the Ohio Administrative Code. The PWS was notified in correspondence dated September 1, 2011, to respond in writing no later than 30 days, with time frames for addressing violations of OAC Rules. On October 5, 2011, a verbal extension was given through October 31, 2011, which was reiterated in writing on October 27, 2011. **A response is overdue for providing time frames for addressing:**

1. OAC Rule 3745-91-02(A) states, "No person shall begin construction or installation of a public water system, or make a substantial change in a public water system, until plans therefor have been approved by the director of environmental protection. An application for approval of plans for such construction, installation, or substantial change in a public water system, as required by section 6109.07 of the Revised Code, shall be submitted to the district office..."

V.H. Allman is a community public water system currently operating without plan approval or a license to operate. Plan approval including the water source, treatment, and distribution must be submitted to this office. Plan approval documents were provided to you during the survey visit. The system currently poses several severe sanitary risks, including the lack of chlorination, the placement of the water line in a ditch, and the condition of the well.

2. OAC Rule 3745-84-02(A) states "Except as provided in section 6109.21 of the Revised Code, no person shall operate or maintain a public water system in the state of Ohio without a public water system license issued by the director."

V.H. Allman Subdivision PWS is currently operating without a valid license. Please submit an application for a license to operate in accordance with OAC Rule 3745-84-02(C).

3. "A public water system shall own all the land or obtain an easement or lease of the sanitary isolation radius of a public water system well." The PWS only controls a portion of the 50' isolation radius of the well as required by OAC Rule 3745-9-04(A)(3).

Pursue ownership or a sanitary easement on all properties within 50' of the well.

4. OAC Rule 3745-9-05 (P) states, "A well cap for a public water system well shall conform with "Water System Council Pitless Adapter Standard PAS-97, Performance Standards for Sanitary Water Well Pitless Adapters, Pitless Units, and Watertight Well Caps (1997).

The well cap lacks an integrated screened vent. The well cap shall be replaced with a cap that conforms with "Water System Council Pitless Adapter Standard PAS-97, Performance Standards for Sanitary Water Well Pitless Adapters, Pitless Units, and Watertight Well Caps" (1997).

5. OAC Rule 3745-9-05 (P) states "Electrical conduit connections on the well cap or seal shall be threaded and sealed to prevent the entrance of insects and water."

The electrical conduit shall be threaded and sealed to the cap to conform to 3745-9-05 (P).

6. OAC Rule 3745-9-05 (O) states, "Well casing height above finished grade shall be at least twelve inches..." In addition, OAC Rule 3745-9-05 (O)(2) states, "The finished grade shall be sloped for surface water runoff away from the well."

The finished grade must be sloped away from the well in accordance with OAC Rule 3745-9-05 (O)(2) and the height of the well casing must be at least twelve inches above finished grade. Contact a well driller to install an extension on the well casing to achieve the required height.

7. OAC Rule 3745-83-01(D) states in part, "All chemicals, substances, and materials added to or brought in contact with water in or intended to be used in a public water system... shall conform with the "American National Standards Institute/National Sanitation Foundation" (ANSI/NSF) standard 60 Drinking Water Treatment Chemicals – Health Effects (2005 and previous), or standard 61 Drinking Water System Components-Health Effects (2005 and previous)."

Documentation was not available to demonstrate the chlorine conforms to ANSI/NSF standard 60. Submit this documentation or use chlorine that conforms to the standard. The chlorine feed equipment currently in place as it poses a significant sanitary risk. Provide specifications for replacement of chemical feed equipment. Upon approval, equipment may be installed and put into service.

8. OAC Rule 3745-83-01(D) states in part, "All chemicals, substances, and materials added to or brought in contact with water in or intended to be used in a public water system... shall conform with the "American National Standards Institute/National Sanitation Foundation" (ANSI/NSF) standard 60 Drinking Water Treatment Chemicals – Health Effects (2005 and previous), or standard 61 Drinking Water System Components-Health Effects (2005 and previous)."

Documentation was not available to demonstrate the water line conforms to ANSI/NSF standard 61. Submit this documentation. As well, the line is run through a ditch with flowing surface water. This poses a significant sanitary risk to customers. Submit plans for the installation of approved water line which meets all applicable design standards, including placement of the line underground to prevent freezing.

9. OAC Rule 3745-83-01 (G)(2) states, "A public water system that provides water treated with chlorine shall monitor for combined chlorine at least once every day that water is available to the public at each entry point to the distribution system and a representative point in the distribution system..." In accordance with OAC 3745-81-27(C)(1)(a), residual disinfectant concentrations for free chlorine and combined chlorine may be measured by using DPD colorimetric test kits. An acceptable DPD colorimetric test kit shall have a method detection limit of 0.1 milligrams per liter (mg/L).

Daily sampling for chlorine residual using a DPD kit must be started and reported per 3745-83-01 using the appropriate monthly operating reports (MORs). A copy of the report is included and can be found on our website.

10. OAC 3745-83-01(C)(1) states "all community public water systems shall maintain a minimum chlorine residual of at least two-tenths milligram per liter free chlorine, or one milligram per liter combined chlorine measured at representative points throughout the distribution system.

Chlorine is not currently added to the supplied water. The chlorine equipment currently in place represents a sanitary risk and should not be used to meet this requirement.

11. OAC 3745-83-01(I)(1)(c) states that monthly operating reports shall include "Information on daily water treatment and system pumpage."

Install a master meter or some other mechanism to allow for the tracking of daily water production and reporting of it on the MOR.

12. A Siting Plan for Total Coliform monitoring was not on file as required by OAC Rule 3745-81-21. A plan template was left with you during the Sanitary Survey.

A Total Coliform Sample Siting Plan shall be completed and a copy submitted to this office.

13. OAC Rule 3745-81-23(B)(1) states "All public water systems which are groundwater systems shall monitor for nitrate annually."

Sampling for nitrate shall occur annually. A sample schedule will be provided by the Ohio EPA, Central Office.

14. OAC Rule 3745-85-01 (B) states, "Each community water system shall prepare and maintain a written contingency plan for providing safe drinking water to its service area under emergency conditions." In addition, OAC Rule 3745-85-01 (E)(1) states that, "The contingency plan...shall be revised and updated as necessary but at least annually."

Develop a written contingency plan and update it at least annually. Copies of the revised plan shall be promptly distributed to the appropriate holders of the plan, including the county EMA director.

15. According to OAC Rule 3745-7-03, the classification of the V.H. Allman Subdivision water system is Class I. In accordance with OAC Rule 3745-7-02 (A)(1), the owner or operator of a public water system shall designate an operator of record with a certification of a class equal to or greater than the classification of the public water system, distribution system or water treatment plant. The water system does not currently have an operator of record holding the correct level of certification and is therefore in violation. In order to address this violation:

- a. Obtain an operator of record to be the on-site certified operator who performs the technical operation of the public water system or each water treatment plant and distribution system within the public water system. Based on the classification listed above, the operator of record must be physically present at the public water system 3 days per week for a minimum of 1.5 hours per week; and
- b. Complete the Operator of Record Notification Form provided during the Sanitary Survey. Mail the completed form to the Operations and Financial Assistance Section, Division of Drinking and Grounds Waters, Ohio EPA, P.O. Box 1049, Columbus, OH 43216-1049. If you have any questions, please contact Dave Bornino at 614-644-2752.
- c. In the event you need assistance in finding an appropriately certified operator you may use Ohio EPA's Contract Operator's List at the following link to assist in your search.
http://www.epa.ohio.gov/portals/28/documents/opcert/contract_operator_list.pdf
- d. OAC Rule 3745-7-03 (B)(3)(d) states that a system is not a Class A system unless it "has no serious public health or environmental hazard associated with the operation of the public water system." Pending the system's ability to address the health hazards, it may be eligible to be classified as a Class A system.

16. OAC Rule 3745-7-09 (A) specifies "The owner and operator of record of a public water system, treatment works or sewerage system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system, treatment works, or wastewater treatment facility within a treatment works."

An operator of record with the appropriate classification must be put under contract and must maintain a log that meets 3745-7-09 (A).

17. A Disinfection By-Products Sample Siting Plan as outlined in OAC Rule 3745-81-24 (C)(2) shall be developed.

The Plan shall meet all applicable rules including OAC Rule 3745-81-24 (C)(3), which states that public water systems shall collect TTHM and HAA5 samples during normal operating conditions. Requiring public water systems to monitor under normal operating conditions ensures that sample collection occurs when distribution system conditions are representative of those conditions under which water is typically delivered to consumers.

18. OAC Rule 3745-95-03(A) states "The supplier of water shall conduct or cause to be conducted periodic surveys and investigations, of frequency acceptable to the director, of water use practices within a consumer's premises to determine whether there are actual or potential cross-connections to the consumer's water system through which contaminants or pollutants could backflow into the public water system."

19. OAC Rule 3745-95-04 (A) states "An approved backflow prevention device shall be installed on each service line to a consumer's water system serving premises, where in the judgment of the supplier of water or the director, a pollutional, system, health or severe health hazard to the public water system exists."

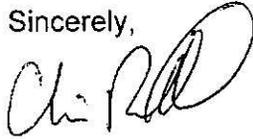
Ensure that an approved backflow prevention device is installed on each service line where a pollutional or health hazard to the public water system exists.

The water system must respond in writing within 15 days from the date of this letter with the required information. Failure to comply may result in further enforcement action.

Mrs. Becky Knutzen
November 4, 2011
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If you have any questions regarding this letter, or any other matter involving your water system, contact me at 419-373-3101.

Sincerely,



Chris Riddle
Environmental Specialist 2
Division of Drinking and Ground Waters

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pc: Auglaize County Health Department
Dave Sprague, City of St Mary's (Water & Sewer Department
Dave Bornino, DDAGW, Operations CO - with enclosures
~~DDAGW~~ NWDO File with enclosures)

ec: Linda Benham, OEPA, NWDO