



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Defiance County
Christi Water System, Inc.
Community Water System
PWS ID#: OH2001003
LEAD / COPPER

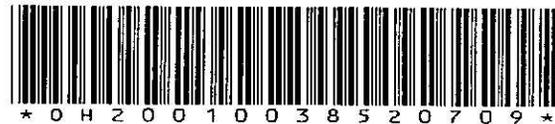
ACTION REQUIRED

January 6, 2009

OH2001003 CHRISTI WATER SYSTEM INC

65 01/07/09

Mr. Terry Beilharz, President
Christi Water System, Inc.
200 Perry Street
Defiance, Ohio 43512



Re: **Notice of Violation –
Lead and Copper Rule Treatment Technique
Failure to Distribute Public Education materials**

Dear Mr. Beilharz:

Christi Water System exceeded the **Lead Action Level** during the 2002-2004 compliance period (June-September 2002 monitoring period) and is, therefore, required to perform additional steps to remain in compliance with the lead and copper rules specified in the Ohio Administrative Code (OAC).

Christi Water System is in violation of the OAC, Rule 3745-81-85 for failure to distribute public education materials for lead by the December 10, 2008 deadline.

Actions required as a result of the above violation:

Public Education

- 1. Distribute public education materials for lead immediately.** As long as your system exceeds the lead action level, Christi Water System must distribute public education materials once every twelve months, based on the original deadline which was December 10th. This is different from, and in addition to, the requirement to issue public notification as described below.
- 2. Within 10 days** of completing Step 1, fill out the attached Verification that the Public was Notified (for Public Education) and send it, along with a copy of the **exact** public education materials distributed, to the Northwest District Office.

Public Notification

- 3. Issue public notification:** Within 30 days of the date of this letter, issue public notification as required by OAC rule 3745-81-32. An example Drinking Water Notice is enclosed.
- 4. Within 10 days** of completing Steps 1 and 2, fill out the attached Verification Form for Tier 2 violations and send it, along with a copy of the Drinking Water Notice issued, to the Northwest District Office.

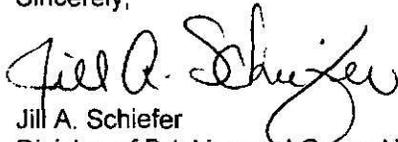
If you have any questions concerning the requirements in this letter or need to request technical assistance, please feel free to contact me at 419-373-3089 or by Email: jill.schiefer@epa.state.oh.us.



Mr. Terry Beilharz
January 6, 2009
Page Two

If you have any questions concerning the requirements in this letter or need to request technical assistance, please feel free to contact me at 419-373-3089 or by Email: jill.schiefer@epa.state.oh.us.

Sincerely,



Jill A. Schiefer
Division of Drinking and Ground Waters

JW/lb

Enclosures: Drinking Water Notice
Public Notice Instructions and Verification Form – Tier 2
Lead Public Education Materials
Verification Form for Lead Public Education Materials

pc: Kelly McKenney, Clerk - Beilharz Architects
Defiance County Health Department
Toni Buchanan, DDAGW-CO
~~DDAGW, NWDO w/Enclosure~~

PUBLIC NOTIFICATION

**PUBLIC NOTICE INSTRUCTIONS AND VERIFICATION FORM FOR
COMMUNITY PUBLIC WATER SYSTEMS WITH TIER 2 VIOLATIONS**

The owner or operator of a community public water system with a Tier 2 violation or situation shall notify the persons served by the public water system as soon as practical but **no later than 30 days** after the system learns of the violation. Public notice shall be repeated every 3 months as long as the violation or situation persists.

I HEREBY CERTIFY THAT THE PUBLIC WAS NOTIFIED BY THE FOLLOWING METHOD(S) INDICATED BELOW, AS DESCRIBED IN THE OHIO ADMINISTRATIVE CODE RULE 3745-81-32:

Required Method of Public Notification	Actual Method of Public Notification
<p>Use the following method to reach all persons served by the public water system:</p> <p>Public notice issued by mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the public water system.</p>	<p>Describe actual methods used to notify public of the violation:</p> <p>A. Date of mailing/delivery</p>
<p>If the above method does not reach all persons served, also use any other method reasonably calculated to reach other persons regularly served by the public water system (e.g., publication in a local newspaper, delivery of multiple copies for distribution by customers that provide their drinking water to others, posting in public places served by the system or on the Internet, or delivery to community organizations). If the notice is posted, it shall remain in place as long as the violation exists, but in no case less than 7 days.</p>	<p>A. Method(s)</p> <p>B. Date(s)</p>

Please check if the public notice used was provided by Ohio EPA (other side of this form) or another acceptable notice was used:

A public notice as shown on the other side of this sheet was issued without changes.

A different public notice was issued. **INCLUDE A COPY OF THE PUBLIC NOTICE.**

Signature of Responsible Official Date

Printed Name and Title of Responsible Official

Christi Water System
PUBLIC WATER SYSTEM

PWSID NUMBER: OH2001003
COUNTY NAME: Defiance

For Ohio EPA use only

Date PN Received: _____

PN acceptable: PN not acceptable:

VIOLATION TYPE: **65**
CONTAMINANT: **Lead and Copper**
COMPLIANCE PERIOD: 1/1/2008 – 12/31/2008

DRINKING WATER NOTICE

Christi Water System Contains High Levels of Lead

FAILURE TO IMPLEMENT TREATMENT TECHNIQUE REQUIREMENTS

We routinely sample water at consumers' taps for lead. The tests show lead levels in the water above the limit, or "action level," so we are required to distribute public education materials for lead to consumers of our water. Christi Water System failed to distribute public education materials by December 10, 2008 as required by Ohio EPA.

What should I do?

Listed below are some steps you can take to reduce your exposure to lead:

- Call us at the number below to find out how to get your water tested for lead.
- Find out whether your pipes contain lead, copper, or lead solder.
- Run your water for 15 - 30 seconds or until it becomes cold before using it for drinking or cooking. This flushes the pipes of standing water which may contain higher levels of lead.
- Don't cook with or drink water from the hot water tap; lead dissolve more easily into hot water.
- **Do not boil your water to remove lead.** Excessive boiling water makes it more concentrated – it remains when the water evaporates.

What does this mean?

Typically, lead enters water supplies by leaching from lead or brass pipes and plumbing components. New lead pipes and plumbing components containing lead are no longer allowed for this reason; however, many older homes may contain lead pipes. Your water is more likely to contain high lead levels if water pipes in or leading to your home are made of lead or contain lead solder.

Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure.

What happened? What is being done?

This is not an emergency. If it had been, you would have been notified immediately. We are distributing our public education materials in conjunction with this public notice.

For more information, please contact _____
name of contact

at _____ or _____
phone number mailing address

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

PWSID#: OH2001003 Date distributed: _____

PUBLIC EDUCATION REQUIREMENTS

VERIFICATION THAT THE PUBLIC WAS NOTIFIED
For Public Education - Community serving population < 3301

I HEREBY CERTIFY THAT THE PUBLIC EDUCATION MATERIAL ATTACHED WAS DISTRIBUTED TO ALL CONSUMERS OF THE DRINKING WATER BY THE METHOD(S) INDICATED BELOW AS REQUIRED BY OAC RULE 3745-81-85.

REQUIRED METHOD OF PUBLIC EDUCATION FOR COMMUNITY WATER SYSTEMS	Distribution Date
<p>Use the following method to reach all persons served by the public water system:</p> <p>Public notice issued by mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the public water system.</p> <p>Public Education materials must be distributed immediately. Return a copy of the materials along with this verification form to your Ohio EPA, Northwest District Office.</p>	<p>Describe actual methods used to notify the public of the violation:</p> <p>Date of mailing/delivery: _____</p>

 Signature of Responsible Official Date

PWS NAME: Christi Water System, Inc.
 PWSID #: 2001003
 COUNTY NAME: Defiance

 Printed Name and Title of Responsible Official

<p><u>For Ohio EPA use only</u> Date PE Received: _____</p> <p>PE acceptable: _____ PE not acceptable: _____</p>	<p>Monitoring Period: June 1 - Sept 30 2002 Compliance Period: 2002-2004 Triennial</p>
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revised December 2005

**PUBLIC EDUCATION REQUIREMENTS
FOR COMMUNITY PUBLIC WATER SYSTEMS
Serving populations less than 3300**

When a water system exceeds the lead action level of 15 µg/L, Ohio Administrative Code rule 3745-81-85 requires the water system to issue public education materials to their water customers by the following methods:

- a. insert notices in each customer's water utility bill containing the wording found in attachment for **Water Bills**; and
- b. deliver pamphlets and/or brochures containing the wording found in attachment for **Pamphlets / Brochures** to facilities and organizations served by the system that are most likely to be visited regularly by pregnant women and children.

These items must be re-issued every 12 months for as long as the water system exceeds the lead action level.

Please note that in the enclosed attachments, there are several locations where your water specific information must be added. These locations are generally indicated in *italics*.

Copies of the public education materials issued, a listing of to whom the public education materials were given, and the dates the public education was issued, must be sent to your Ohio EPA district office.

U.S. EPA also has a web site with templates for public education that you might find useful. This site is located at: <http://www.epa.gov/safewater/lcrmr/implement.html>

ATTACHMENT for WATER BILLS

SOME HOMES IN THIS COMMUNITY HAVE ELEVATED LEAD LEVELS IN THEIR DRINKING WATER. LEAD CAN POSE A SIGNIFICANT RISK TO YOUR HEALTH. PLEASE READ THE ENCLOSED NOTICE FOR FURTHER INFORMATION.

INTRODUCTION

The United States Environmental Protection Agency (USEPA) and _____ *[insert name of water supplier]* are concerned about lead in your drinking water. Although most homes have very low levels of lead in their drinking water, some homes in the community have lead levels above the USEPA action level of 15 parts per billion (ppb) or 0.015 milligrams of lead per liter of water (mg/L). Under Federal law we are required to have a program in place to minimize lead in your drinking water by _____ *[insert date when corrosion control will be completed for your system]*. This program includes corrosion control treatment, source water treatment, and public education. We are also required to replace lead service lines that we control if the lines contribute lead concentrations of more than 15 ppb after we have completed the comprehensive treatment program. If you have any questions about how we are carrying out the requirements of the lead regulation, please give us a call at _____ *[insert water system's phone number]*. This brochure explains the simple steps you can take to protect yourself and your family by reducing your exposure to lead in drinking water.

HEALTH EFFECTS OF LEAD

Lead is a common, natural, and often useful metal found throughout the environment in lead-based paint; air; soil; household dust; food; certain types of pottery, porcelain, and pewter; and water. Lead can pose a significant risk to your health if too much of it enters your body. Lead builds up in the body over many years and can cause damage to the brain, red blood cells, and kidneys. The greatest risk is to young children and pregnant women. Amounts of lead that won't hurt adults can slow down normal mental and physical development of growing bodies. In addition, a child at play often comes into contact with sources of lead contamination like dirt and dust that rarely affect an adult. It is important to wash children's hands and toys often and try to make sure they only put food in their mouths.

LEAD IN DRINKING WATER

- (a) Lead in drinking water, although rarely the sole cause of lead poisoning, can significantly increase a person's total lead exposure, particularly the exposure of infants who drink baby formulas and concentrated juices that are mixed with water. The USEPA estimates that drinking water can make up 20 percent or more of a person's total exposure to lead.
- (b) Lead is unusual among drinking water contaminants in that it seldom occurs naturally in water supplies like rivers and lakes. Lead enters drinking water primarily as a result of corrosion, or wearing away, of materials containing lead in the water distribution system and household plumbing. These materials include lead-based solder used to join copper pipe, brass and chrome plated brass faucets, and, in some cases, pipes made of lead that connect your house to the water main (service lines). In 1986, Congress banned the use of lead solder containing more than 0.2% lead and restricted the lead

content of faucets, pipes, and other plumbing materials to not more than 8.0%.

- (c) When water stands in lead pipes or plumbing systems containing lead for several hours or more, the lead may dissolve into your drinking water. This means the first water drawn from the tap in the morning, or later in the afternoon after returning from work or school, can contain fairly high levels of lead.

STEPS YOU CAN TAKE IN THE HOME TO REDUCE EXPOSURE TO LEAD IN DRINKING WATER

- (a) Despite our best efforts to control water corrosivity and remove lead from the water supply, lead levels in some homes or buildings can be high. To find out whether you need to take action in your own home, have your drinking water tested to determine if it contains excessive concentrations of lead. Testing the water is essential because you cannot see, taste, or smell lead in drinking water. Some local laboratories that can provide this service are listed at the end of this booklet. For more information on having your water tested, please call _____ *[insert phone number of water system]*.
- (b) If a water test indicates that the drinking water drawn from a tap in your home contains lead above 15 ppb, then you should take the following precautions:
 - (i) Let the water run from the tap before using it for drinking or cooking any time the water in a faucet has gone unused for more than six hours. The longer water resides in your home's plumbing the more lead it may contain. Flushing the tap means running the cold water faucet until the water gets noticeably colder, usually about 15-30 seconds. If your house has a lead service line to the water main, you may have to flush the water for a longer time, perhaps one minute, before drinking. Although toilet flushing or showering flushes water through a portion of your home's plumbing system, you still need to flush the water in each faucet before using it for drinking or cooking. Flushing tap water is a simple and inexpensive measure you can take to protect your family's health. It usually uses less than one or two gallons of water and costs less than _____ *[insert a cost estimate based on flushing two times a day for 30 days]* per month. To conserve water, fill a couple of bottles for drinking water after flushing the tap, and wherever possible use the first flush water to wash the dishes or water the plants. If you live in a high-rise building, letting the water flow before using it may not work to lessen your risk from lead. The plumbing systems have more, and sometimes larger, pipes than smaller buildings. Ask your landlord for help in locating the source of the lead and for advice on reducing the lead level.
 - (ii) Try not to cook with or drink water from the hot water tap. Hot water can dissolve more lead more quickly than cold water. If you need hot water, draw water from the cold tap and heat it on the stove.
 - (iii) Remove loose lead solder and debris from the plumbing materials installed in newly constructed homes, or homes in which the plumbing has recently been replaced, by removing the faucet strainers from all taps and running the water from 3 to 5 minutes. Thereafter, periodically remove the strainers and flush out any debris that has accumulated over time.

- (iv) If your copper pipes are joined with lead solder that has been installed illegally since it was banned in 1986, notify the plumber who did the work and request that he or she replace the lead solder with lead-free solder. Lead solder looks dull gray, and when scratched with a key looks shiny. In addition, notify the Ohio EPA Division of Drinking and Ground Waters (telephone 614-644-2752) about the violation.
 - (v) Determine whether or not the service line that connects your home or apartment to the water main is made of lead. The best way to determine if your service line is made of lead is by either hiring a licensed plumber to inspect the line or by contacting the plumbing contractor who installed the line. You can identify the plumbing contractor by checking the city's record of building permits which should be maintained in the files of the _____ *[insert name of department that issues building permits]*. A licensed plumber can at the same time check to see if your home's plumbing contains lead solder, lead pipes, or pipe fittings that contain lead. The public water system that delivers water to your home should also maintain records of the materials located in the distribution system. If the service line that connects your dwelling to the water main contributes more than 15 Ppb lead to drinking water, after our comprehensive treatment program is in place, we are required to replace the line. If the line is only partially controlled by the _____ *[insert name of the city, country, or water system that controls the line]*, we are required to provide you with information on how to replace your portion of the service line, and offer to replace that portion of the line at your expense and take a follow-up tap water sample within fourteen days of the replacement. Acceptable replacement alternatives include copper, steel, iron, and plastic pipes.
 - (vi) Have an electrician check your wiring. If grounding wires from the electrical system are attached to your pipes, corrosion may be greater. Check with a licensed electrician or your local electrical code to determine if your wiring can be grounded elsewhere. **DO NOT attempt to change the wiring yourself because improper grounding can cause electrical shock and fire hazards.**
- (c) The steps described above will reduce the lead concentrations in your drinking water. However, if a water test indicates that the drinking water coming from your tap contains lead concentrations in excess of 15 ppb after flushing, or after we have completed our actions to minimize lead levels, then you may want to take any of the following additional measures:
- (i) Purchase or lease a home treatment device. Home treatment devices are limited in that each unit treats only the water that flows from the faucet(s) to which it is connected, and all of the devices require periodic maintenance and replacement. Devices such as reverse osmosis systems or distillers can effectively remove lead from your drinking water. Some activated carbon filters MAY reduce lead levels at the tap; however, all lead reduction claims should be investigated. Be sure to check the actual performance of a specific home treatment device before and after installing the unit.
 - (ii) Purchase bottled water for drinking and cooking.

(d) You can consult a variety of sources for additional information. Your family doctor or pediatrician can perform a blood test for lead and provide you with information about the health effects of lead. State and local government agencies that can be contacted include:

(i) _____ *[Insert the name of city and county department of public utilities]* at _____ *[insert phone number]* can provide you with information about your community's water supply, and a list of local laboratories that have been certified by EPA for testing water quality;

(ii) _____ *[Insert the name of city or county department that issues building permits]* at _____ *[insert phone number]* can provide you with information about building permit records that should contain the names of plumbing contractors that plumbed your home; and

(iii) The Ohio Department of Health at (614) 466-1450 or the _____ *[insert name of the city or county health department]* at _____ *[insert phone number]* can provide you with information about the health effects of lead and how you can have your child's blood tested.

(e) The following is a list of some Ohio Environmental Protection Agency-approved laboratories in your area that you can call to have your water tested for lead. *[Insert names and phone numbers of at least two laboratories]."*
