



Environmental
Protection Agency

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

OH3539212

HENRY COUNTY REGIONAL WSD

11/1/2011



Re: Henry County
Community PWS
Henry County Water & Sewer District
PWS ID# OH 3539212
STU ID# 3561990, 3562299

November 1, 2011

Mr. Nick Rettig, Director
Henry County Regional Planning Commission
Henry County Office Complex
1857 Oakwood Ave.
Napoleon, Ohio 43545

Dear Mr. Rettig:

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

This letter is notification that the Henry County Water & Sewer District public water system has not complied with requirements issued during this Agency's last survey performed on July 26, 2011, in violation of rule 3745-81-60 of the Ohio Administrative Code. **The PWS was notified in correspondence dated September 21, 2011, to respond in writing no later than 30 days, with time frames for:**

1. A Siting Plan for Total Coliform monitoring was not on file as required by OAC Rule 3745-81-21.

A Total Coliform Sample Siting Plan for Total Coliform should be completed and a copy submitted to this office. Monthly samples are required for two STU's to provide analysis representative of water provided to customers on each water line.

2. 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 holders of the plan including the county EMA director.

The plan should be practiced as a part of emergency response training for county and local first responders to ensure it is workable and that all parties are familiar with their responsibilities.

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

The Plan should 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.

Performing annual flushing of the distribution system just prior to sampling is not considered "normal operating conditions" and samples should not be collected under such conditions. Results for samples collected under such conditions will not be accepted for compliance purposes. Public water systems will receive a monitoring violation, requiring public notification, for any monitoring period in which the required minimum number of samples is not received.

4. OAC Rule 3745-83-01 (G)(1) states, "A public water system that provides water treated with chlorine shall monitor for free 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..."

Free chlorine residual shall be correctly determined daily and reported on all future operation reports beginning October 1, 2011. Operation reports are required for two STU's to provide analysis representative of water provided to customers on each water line.

5. 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..."

Combined chlorine residual shall be correctly determined daily and reported on all future operation reports beginning October 1, 2011. Operation reports are required for two STU's to provide analysis representative of water provided to customers on each water line.

6. OAC Rule 3745-81-70 (E)(1) states total chlorine "Residual disinfectant level shall be measured at the same points in the distribution system and at the same time as total coliforms are sampled."

Total chlorine residual shall be monitored when total coliform is sampled and reported on all future operation reports beginning October 1, 2011.

7. OAC Rule 3745-83-01 (I)(1)(c) states "Information on daily water treatment and system pumpage" shall be reported on operation reports.

Report daily system pumpage on all future operation reports beginning October 1, 2011.

8. 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 polluttional, system, health or severe health hazard to the public water system exists."

Ensure customers have appropriate backflow prevention devices in service where applicable.

9. OAC Rule 3745-95-06 (C)(3) states, "The consumer shall... have thorough inspections and operational tests made of backflow prevention devices at the time of installation or repair, and as may be reasonably required by the supplier of water or the director, but in all cases at least once every twelve months." OAC Rule 3745-95-06 (C)(2) states, "It shall be the duty of the supplier of water to see that the tests and inspections... are made."

In addition, OAC 3745-95-06 (C)(5) states, "Records of such inspections, tests, repairs and overhaul shall be kept by the consumer and made available to the supplier of water."

Records of such activities shall be made available during the sanitary survey.

10. 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 log is required for the Water District's system.

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Specifically, the operator's log should include the items listed in OAC Rule 3745-7-09(A)(1) through 3745-7-09(A)(4). The log may be kept on site at the Planning Commission Office.

11. The bulk water facility located on Route 108 has not been installed according to plan approval. Adjustments are being considered to allow for more effective operation of the facility. Please submit drawings of the final design to this office for review prior to putting the facility into service. Plan approval modifications may be required before the facility can be used by the public.

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.

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

/l/r

pc: Henry County Health Department
OEPA Central Office, DDAGW
DDAGW, NWDO, File