



Re: Huron County
IRBW Properties, LTD dba Willard MHP
Community Public Water System (PWS)
PWS ID# OH3901612
STU ID# 3955248

July 20, 2011

Ms. Julie L. Vantaggi, Project Manager
I & R Properties, Incorporated
6 Corporation Center
Broadview Heights, Ohio 44147

Notice of Violations – Monthly Report

Dear Ms. Vantaggi:

The Division of Drinking and Ground Waters (DDAGW) Plant – Distribution Monthly Operating Report (MOR) for the month of June 2011, was received late by the OHIO EPA on July 11, 2011. The MOR for the month of May 2011 was received as required on June 6, 2011. The June and May 2011, MOR(s) were also not signed and submitted by the designated operator in responsible charge.

OAC rule 3745-83-01 (I) (2) states that "the operation report shall be signed by the operator in responsible charge designated in accordance with rule 3745-7-02 of the Administrative Code and submitted to the... (OHIO EPA)... no later than the tenth of the month following the month for which the report was prepared."

The PWS must have the designated operator in responsible charge sign the monthly operation reports and submit these reports to the OHIO EPA no later than the tenth of the month following the month for which reports were prepared.

Review of these reports indicates that the analytical results (3.65 mg/L & 1.12 mg/L) for iron exceed the secondary maximum contaminant level (MCL) during the months of June and May 2011, respectively. The Ohio Administrative Code (OAC) rule 3745-82-02 establishes the secondary MCL at (0.3 mg/L) for iron. OAC rule 3745-91-09 requires provision of treatment for removal of iron when an excessive amount of this substance is present in the untreated water. Consider the following items to determine why the standard is not being met:

1. Review the sampling location and technique used (i.e. was the sample pulled too soon after backwash events?)
2. Review the operation/maintenance of the filtering units (i.e. what is the head loss across the whole unit, is the filter media cemented or is channeling of the media occurring?)

Ms. Julie L. Vantaggi, Project Manager
July 20, 2011
Page 2

3. Provide additional units/new equipment, or change treatment sequence. *

** Note: Plan approval by this agency is required whenever a substantial change is made to the water system.*

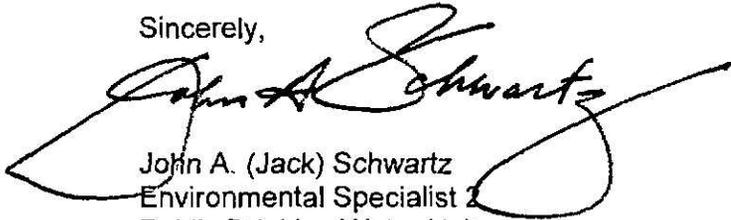
Additionally, there was one day during the month of May 2011 that chlorine residuals were below the minimum allowable level of either 0.2 mg/L free chlorine residual or 1.0 mg/L combined chlorine residual in the distribution system. OAC rule 3745-83-01 (C) (1) states that "...all community public water 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..."

The PWS must maintain at least the minimum required chlorine residuals throughout the entire distribution system.

Continued failure to take action to address violations and deficiencies may result in enforcement action being taken.

If you have any questions regarding this letter, or any other matter involving your PWS, then contact me directly by telephone at (419) 373-3088 or via electronic messaging at jack.schwartz@epa.state.oh.us.

Sincerely,



John A. (Jack) Schwartz
Environmental Specialist 2
Public Drinking Water Unit
Division of Drinking and Ground Waters

JAS/llr

pc: Daniel E. Inks, General Manager
Robert C. (Bob) Davis, Operations Manager
James R. (Jim) Inks, Property Supervisor
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