



Environmental
Protection Agency

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

OH3901612

IRBW PROPERTIES LTD

3/22/2011



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

March 22, 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 February 2011, was received by the Ohio EPA-Northwest District Office (NWDO) as required on March 10, 2011.

Review of the report indicated that the analytical result (1.06 mg/L) for iron exceeded the secondary maximum contaminant level (MCL) during the month of February 2011. 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?)
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.*

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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 district office no later than the tenth of the month following the month for which the report was prepared."

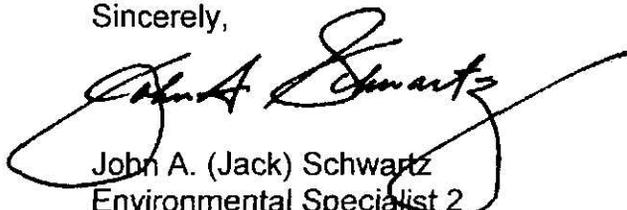
Further review of the February 2011 monthly report, and also the previous MORs from September through December 2010, indicates that they were not submitted by the designated operator in responsible charge.

The PWS must have the designated operator in responsible charge submit the monthly operation reports.

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/lir

pc: Daniel E. Inks, General Manager
Robert C. (Bob) Davis, Operations Manager
James R. (Jim) Inks, Property Supervisor
Robert Lyn Makeever, Engineering Consultant
Huron County Health Department
DDAGW, NWDO Correspondence File

ec: Linda S. Benham, Environmental Supervisor, DDAGW, NWDO
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