



Environmental  
Protection Agency

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

OH3901612

IRBW PROPERTIES LTD

1/19/2011



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

January 19, 2011

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

### Notice of Violation – Monthly Report

Dear Ms. Vantaggi:

The Division of Drinking and Ground Waters (DDAGW) Plant – Distribution Monthly Operating Report (MOR) for the month of December 2010, was received by the Ohio EPA-Northwest District Office (NWDO) as required on January 7, 2011.

Review of the report indicated that the analytical result (1.37 mg/L) for iron exceeded the secondary maximum contaminant level (MCL) during the month of December 2010. 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.*

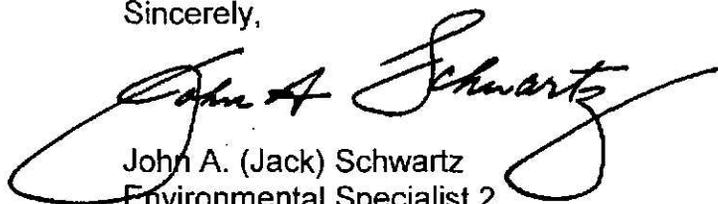
Ms. Julie L. Vantaggi, Project Manager  
January 19, 2011  
Page 2

Further review indicates that there were several days during the month of December 2010, that combined chlorine residuals were reportedly not measured either at the entry point to the distribution system or at a representative point in the distribution system. OAC rules 3745-83-01 (G) (1) & (2) state the free and combined chlorine residuals shall be monitored at least once every day that water is available to the public at the entry point to the distribution system and a representative point in the distribution system.

**Continued failure to take action to address these 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](mailto: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/

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  
JoAnn Sabo, DOCC, DDAGW, NWDO