



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
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 Korteski, Director

Re: Huron County  
IRBW Properties, Ltd. dba  
Willard Mobile Home Park PWS  
Community Water System  
PWS ID #3901612

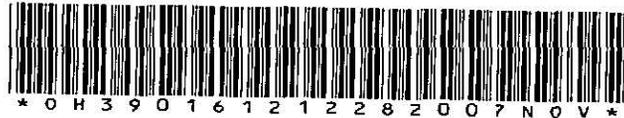
December 28, 2007

OH3901612

IRBW PROPERTIES LTD

12/28/2007

Daniel E. Inks, President  
I & R Properties, Incorporated  
9 Corporation Center  
Broadview Heights, Ohio 44147



**SUBJECT: CCR VIOLATION**

Dear Mr. Inks:

Ohio EPA received the 2006 Consumer Confidence Report (CCR) for the Willard Mobile Home Park (MHP) public water system (PWS) on June 20, 2007. The CCR was reviewed for the required content. Based on our review, the Willard MHP PWS is in violation of the Ohio Administrative Code (OAC) Rules 3745-96-01 through 04 for failure to comply with the CCR requirements, the following violation was noted:

- The required source water assessment information was missing.

Your source water assessment was completed and the report was sent to you on December 31, 2003. You were required to notify consumers of the availability of the assessment and how to obtain a copy. The inclusion of a brief summary of your source water susceptibility to contamination based on the findings of the source water assessment was required. A summary was provided to you as part of the source water assessment process. That summary or equivalent language must be included in each CCR.

The following language was suggested for your CCR:

Ohio EPA recently completed a study of the IRBW Properties, Inc. dba Willard MHP's source of drinking water, to identify potential contaminant sources and provide guidance of protecting the drinking water source. According to this study, the aquifer (water-rich zone) that supplies water to the IRBW Properties, Inc. dba Willard MHP has a low susceptibility to contamination. This determination is based on the following:

- ▶ presence of a thick protective layer of clay overlying the aquifer,
- ▶ significant depth (over 70 feet below ground surface) of the aquifer,

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- ▶ no evidence to suggest that ground water has been impacted by any significant levels of chemical contaminants from human activities,
- ▶ no apparent significant potential contaminant sources in the protection area.

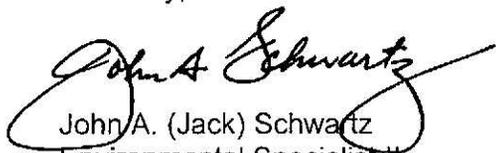
This susceptibility means that under currently existing conditions, the likelihood of the aquifer becoming contaminated is relatively low. This likelihood can be minimized by implementing appropriate protective measures. More information about the source water assessment or what consumers can do to help protect the aquifer is available by calling [insert your contact #].

Be sure to correct the violation as appropriate in your next CCR. The next report for calendar year 2007 must be sent to your customers by no later than July 1, 2008. A copy of the CCR along with a Certification Form must be submitted to the Northwest District Office at the above address. Violations in future reports may result in further enforcement action.

The CCR template and template guide are accessible via the internet on our website at [www.epa.state.oh.us/ddagw/ccr.html](http://www.epa.state.oh.us/ddagw/ccr.html).

If you have any questions, then please contact me directly by telephone at (419) 373-3088 or via the internet at [jack.schwartz@epa.state.oh.us](mailto:jack.schwartz@epa.state.oh.us).

Sincerely,



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

JAS/csl

pc: Bob Davis, Operations Manager  
Robert Lyn Makeever, Operator  
Huron County Health Department  
DDAGW, NWDO, Correspondence File

ec: Ellen Gerber, Manager, DDAGW, NWDO  
Linda Benham, Supervisor, DDAGW, NWDO