



State of Ohio Environmental Protection Agency

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OH3901012

NORTH FAIRFIELD, VILLAGE OF

5/19/2010

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419



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Re: Huron County
North Fairfield Village PWS
Community Water System
PWS ID# OH3901012
STU ID# 3955243

May 19, 2010

CERTIFIED MAIL

Mr. Carl Essex, Administrator
Village of North Fairfield
P. O. Box 188
North Fairfield, Ohio 44855

Subject: Notice of Violation for Failure to Respond to Significant Deficiencies

This letter is notification that the North Fairfield Village public water system PWS has not complied with requirements issued during this Agency's last survey performed on September 22, 2009, in violation of rule 3745-81-60 of the Ohio Administrative Code (OAC). The Village was notified in correspondence dated November 2, 2009, to respond in writing no later than 45 days, with time frames for:

1. OAC rule 3745-85-01 (E) (1) states that "the contingency plan...shall be revised and updated as necessary, but at least annually."

The PWS must ensure that its written contingency plan be updated/revised at a minimum annually according to OAC rule 3745-85-01. When reviewing your plan, make sure that you reflect not only personnel and/or system changes, but also the most recent depressurization procedures. You must keep copies of the revised contingency plan in the Village Administrator's office and the WTP Operator's office. Three additional copies of the plan shall also be kept at Various, accessible, secure locations within the service area.

2. OAC rule 3745-95-09 (A) states that "yard hydrants with weep holes are prohibited."

The PWS must ensure that the frost-free flush hydrant located just outside of the High Street pump house is replaced/retrofitted/removed because it reportedly has a weep hole which is strictly prohibited according to OAC rule 3745-95-09 (A).

3. OAC rule 3745-95-03 (A) states that "the supplier of water shall conduct or cause to be conducted periodic surveys and investigations...of water use practices within a consumer's premises to determine whether there are actual or potential cross-connections to the consumer's water system through which contaminants or pollutants could backflow into the public water system."

The PWS must conduct or cause to be conducted periodic surveys and investigations of water use practices within consumers' premises to determine whether there are actual or potential cross-connections to consumers' water systems through which contaminants or pollutants could backflow into the PWS.

OAC rule 3745-95-04 lists facilities where backflow prevention devices are required. The types of acceptable devices are listed in OAC rule 3745-95-06.

Residential services with cisterns/wells are examples of connections that would require backflow prevention devices. The water dispensing station located on West Ashtabula Street was the only service connection known to have a backflow prevention device and that device has not been tested annually by a certified backflow device tester.

OAC rule 3745-95-06 (C) (3) states that "the consumer shall, on any premises on which backflow prevention devices required by rules 3745-95-04 and 3745-95-05 of the Administrative Code are installed, have thorough inspections and operational tests made of the 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. These inspections and tests shall be at the expense of the water consumer and shall be performed by the supplier of water or a person approved by the supplier as qualified to inspect and test backflow prevention device."

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

The PWS must ensure that the backflow prevention device located at the water dispensing station is tested annually by a certified backflow device tester. Records of such inspections, tests, repairs and overhaul shall be kept and made available to the PWS.

4. OAC rule 3745-7-09 (A) states that "the owner and operator of record of a public water 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... Some of the formats in which the records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs."

The PWS must cause to be maintained, that is to record and document, operation and maintenance activities/events/measurements/analytical results. This would include dates and times of all specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of...water conveyed...or produced, performance of preventive maintenance and repairs, replacement of hydrants, water treatment equipment repairs/replacement, water line breaks and repairs, etc.

5. OAC rule 3745-81-70 (A) states that "each public water system required to monitor under this rule ('monitoring requirements for disinfectant residuals') shall develop and implement a monitoring plan. The public water system shall maintain the plan and make it available for inspection... The director may also require any other public water system to submit such a plan. The plan shall include at least the specific locations and schedules for collecting samples for any parameters included in this rule, and the plan shall include how the public water system will calculate compliance with MRDLs."

The PWS must develop and complete a written 'Disinfectant/Disinfection Byproducts (D/DBP) Sample Monitoring Plan' and then submit a copy to NWDO. Maintain/update this plan periodically and make it available for inspection. The plan shall include at least the specific locations (also a map) and schedules for collecting samples for any parameters included in this rule. The plan shall also include how the PWS will calculate (i.e. total chlorine measurements) compliance with the Maximum Residual Disinfectant Level (MRDL).

An Ohio EPA-DDAGW 'D/DBP Sample Monitoring Plan' template and instructions for completing it is available on the Ohio EPA web site at <http://www.epa.ohio.gov>.

6. OAC rule 3745-83-01 (D) refers to the approval of chemicals and states that "all chemicals, substances, and materials added to or brought in contact with water in or intended to be used in a public water system or used for the purpose of treating, conditioning, altering, or modifying the characteristics of such water shall be shown by either the manufacturer, distributor, or purveyor to be non-toxic and harmless to humans when used in accordance with the formulation and concentration as specified by the manufacturer, and shall conform with the American National Standards Institute/National Sanitation Foundation' (ANSI/NSF) standard 60 Drinking Water Treatment Chemicals – Health Effects (2005 and previous)... Any organization certified by the 'American National Standards Institute' may certify in writing that a product conforms with these standards."

The PWS must ensure that the sodium hypochlorite chemical product utilized conforms to ANSI/NSF standard 60.

7. OAC rule 3745-9-04 (A)(6) states that "potential sources of contamination shall not be...placed within the sanitary isolation radius of a public water system well."

Mr. Carl Essex, Administrator
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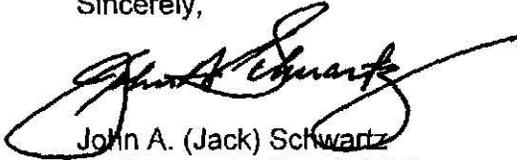
*Agricultural activity occurs approximately 25 to 30 feet away from Well #1 and Well #2.
The sanitary isolation radius for each of these wells is 260 feet.*

The PWS must ensure that the application of chemicals within the isolation radius for both Well #1 and Well #2 is prohibited.

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 the sanitary evaluation survey, this letter, or any other matter involving your public water system, then please feel free to contact me directly at this office
(419) 373-3088 or on the web 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/ltr

pc: Matt J. Brooks, Operator of Record
Michelle Whitright, Finance Officer
Huron County Health Department
Dave Bornino, DDAGW, O&FA, CO
{DDAGW-NWDO Correspondence File}
{Certified Receipt Number 7007 2560 0000 4485 7465 }

ec: Linda Benham, Environmental Supervisor, DDAGW, NWDO
JoAnn Sabo, Compliance Coordinator, DDAGW, NWDO

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Sent To
 CARL ESSEX, Administrator - UCL OF NORTH FAIRFIELD
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 NORTH FAIRFIELD OH 44855

PS Form 3800, August 2006

See Reverse for Instructions