



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 Korleski, Director

Re: Mercer County
Grand Lake MHP PWS
Community Water System
PWS ID #5400312

February 26, 2009

OH5400312

GRAND LAKE MOBILE HOME PARK

2/26/2009

Mr. Scott D. Osborne, Manager
Grand Lake Mobile Home Park
6953 State Route 219, Lot #79
Celina, Ohio 45822



SUBJECT: CCR VIOLATIONS

Dear Mr. Osborne:

The Ohio EPA-Northwest District Office (NWDO) received the 2007 Consumer Confidence Report (CCR) for the Grand Lake Mobile Home Park (MHP) public water system (PWS) on July 23, 2008. The CCR was reviewed for the required content. Based on our review, the Grand Lake 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 violations were noted:

Major Violation

1. The Grand Lake MHP 2007 CCR was not prepared and delivered to customers as required by July 1, 2008. A copy of the 2007 CCR along with its Certification Form was also not received at NWDO by the July 1, 2008 reporting deadline as required by OAC rule 3745-96-04 (C).

Minor Violations

2. The 'Table of Detected Contaminants', an essential part of the CCR, was mostly unacceptable because of numerous errata and omissions. The Table was to include the most recent data for all detected contaminants that were found, but does not need to include any data older than five years. **Do not include in the Table contaminants that are not detected.**

Specifically, Total Coliform bacteria were not detected in the 2007 sample year while the 'Inorganic Contaminant' Copper was not detected in its last sample year (2006). Haloacetic acids (HAA5) must be categorized as a 'Volatile Organic Contaminants'. The 'Level Found' (Your Water) values listed for Total Trihalomethanes (TTHMs) and HAA5s were incorrect. The following two 'Radioactive Contaminants', which were detected from the entry point tap in 2003, were omitted from the Table: Radium 226 and Gross Beta Particle Activity. The 'Inorganic Contaminant' Lead was detected during the 2006 sample year yet was omitted.

The 'Residual Disinfectant' category, concerning Total Chlorine levels measured at the same time that routine bacterial samples were obtained during the 2007 monitoring year, was also omitted from your Table of Detected Contaminants. These contaminant levels are reported on the Total Chlorine Residual Quarterly Operating Report form 5114.

I have enclosed a copy of your 2007 CCR with my comments regarding appropriate corrections to the Table. An example CCR 'Table of Detected Contaminants' can also be found on pages 4-5 in the CCR Template Instruction Guide. [OAC rule 3745-96-02 (D)]

3. Three key terms, ppm (mg/L), ppb (ug/L), and (pCi/L) that were to have been used in the report, which your customers may need to understand the contaminant data, must also be clearly defined as follows:

"Parts per Million (ppm) or Milligrams per Liter (mg/L) are units of measure for concentration of a contaminant. A part per million corresponds to one second in a little over 11.5 days."

"Parts per Billion (ppb) or Micrograms per Liter (ug/L) are units of measure for concentration of a contaminant. A part per billion corresponds to one second in 31.7 years."

"Picocuries per liter (pCi/L): A common measure of radioactivity."

4. Monitoring violation information was omitted regarding the failure to sample for Total Coliform bacteria in December 2007. There was to have been a paragraph describing the violation that occurred, the length of time the water system remained in violation, and the steps taken to correct the violation. [OAC rule 3745-96-02 (F)(1)]
5. Required health language due to an exceedance of an 'Action Level' was included for Copper. Since the most recent copper levels (2006) were found to be below detectable limits, then copper should not have been addressed in the 'Table of Detected Contaminants', and neither should its associated violation health information paragraph have appeared in the CCR text.
6. Finally, a 'Good Faith Effort' to reach all non-bill paying consumers was not denoted in that section of the Certification Form. Posting the CCR at the mailboxes would have been considered an acceptable effort and that action must be denoted on the Certification Form. [OAC rule 3745-96-04 (B)]

Be sure to correct the violations as appropriate in your next CCR. The next report for calendar year 2008 must be sent to your customers by no later than July 1, 2009. A copy of the CCR along with a Certification Form must also be submitted to NWDO by no later than July 1, 2009 at the above address.

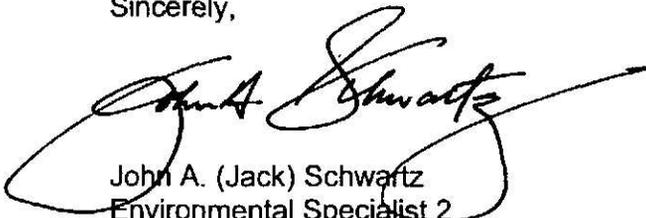
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Violations in future reports may result in further enforcement action.

The CCR template and template instruction guide are accessible on the Agency website at:
<www.epa.state.oh.us/ddagw/Documents/ccrtemplateInstructions08>.

If you have any questions regarding this letter or any other matter, then please contact me directly by telephone at (419) 373-3088 or via the internet 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/lb

Enclosures

pc: Dennis C. (Duke) Osborne, Owner
Pauletta Osborne, Partner
Mercer County Health Department
DDAGW, NWDO Correspondence File

ec: Linda Benham, Environmental Supervisor, DDAGW, NWDO