



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Ottawa County
Green Valley MHP
Community Water System
PWS ID# 6201212

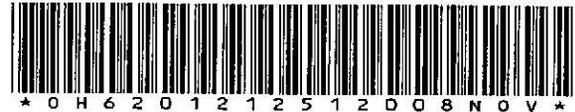
May 1, 2008

OH6201212

GREEN VALLEY MOBILE HOME PARK

5/1/2008

Mr. Joseph Street
Green Valley MHP
1795 Elliston - Trowbridge Road
Elmore, Ohio 43416



Dear Mr. Street:

Subject: Notice of Violation for Failure to Respond to a Significant Deficiency

This letter is notification that Green Valley Mobile Home Park (MHP) has not complied with requirements issued during this Agency's last survey performed on January 29, 2008, in violation of Ohio Administrative Code, Rule 3745-81-60. Green Valley MHP was notified in correspondence dated February 12, 2008 of the requirement to respond in writing within 45 days, with a schedule for corrective actions to address the following:

1. OAC Rule 3745-81-24(C)(2) requires that, each public water system that monitors for Total Trihalomethanes and Haloacetic Acids, Five (TTHMs and HAA5) shall develop and implement a sample monitoring plan. The plan must include at least the specific locations and schedules for collecting samples for TTHMs and HAA5. Failure to monitor according to the monitoring plan is a monitoring violation.

Submit a copy of the facility Disinfectants / Disinfection Byproducts Sample Monitoring Plan to Ohio EPA, along with the written response to this letter. A template for the Plan was provided at the time of the survey.

2. OAC Rule 3745-81-21(A) states that, public water systems shall maintain a written bacteriological sample siting plan. The existing plan had not been updated recently and contained old lab information.

Update the existing copy of the bacteriological sample siting plan for the water system and submit a copy, along with the written response to this letter. A template was provided at the time of the survey.

3. OAC Rule 3745-7-09(A) specifies that the owner and operator of a public water system must maintain operation and maintenance records for the public water system.

The records must include at a minimum, "(a) Identification of the public water system, sewerage system, or treatment works; (b) Date and times of arrival and departure for the operator of record and any other operator required by this chapter; (c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; (d) Results of tests performed and samples taken, unless documented on a laboratory sheet; (e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and (f) Identification of the persons making entries.

OAC Rule 3745-7-09(A) states that, "Some formats in which the records can be maintained include...hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs."

Operation and maintenance logs must be maintained by the water system that meet the requirements specified above.

4. OAC Rule 3745-9-05(T) states that, "A vent shall be provided on all well caps... A well vent shall be self-draining, screened with a noncorroding mesh screen of fifteen to thirty mesh, pointed downward at or above the top of the casing or pitless unit. A vent shall terminate not less than twelve inches above ground surface..."

The current wells do not have appropriate vents in the caps. Provide vents that meet the specifications in OAC Rule 3745-9-05(T).

5. OAC Rule 3745-9-05(U)(1) states that, "Casing and top of well shall be protected against contamination or inadvertent damage."

Additional grading must be completed around the well casing to ensure that water does not pond around the well and potentially contaminate the water source. In addition, the well #2 (east) casing does not have any grass growing around it and it appears that herbicides have been sprayed around it. If this is occurring, herbicide must not be applied around the well casing, to avoid *potential contamination of the water supply*.

6. OAC Rule 3745-83-01(D) 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), or standard 61 Drinking Water System Components - Health Effects (2005 and previous).

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The bleach used as the disinfectant for the system must be NSF approved. Confirm that an NSF approved Sodium hypochlorite solution is used and that if the concentration varies greatly from the current 10.0 % that is being used the dosage is adjusted accordingly.

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, please contact me at 419-373-3101 or via Email at ben.smith@epa.state.oh.us.

Sincerely,



Ben Smith
Environmental Specialist 2
Division of Drinking and Ground Waters

/llr

pc: Ottawa County Health Department
DDAGW, CO, Attn: Dave Evans
4DDAGW; NWDO File, Green Valley MHP