



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
Greenwood MHP
Community Water System
PWS ID# 6201312

April 30, 2008

OH6201312

GREENWOOD MOBILE HOME PK

4/30/2008

Ms. Dawn Angel, Owner
Greenwood MHP
2186 West Lakeshore Drive
Port Clinton, Ohio 43452



Dear Ms. Angel:

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

This letter is notification that Greenwood Mobile Home Park (MHP) has not complied with requirements issued during this Agency's last survey performed on February 5, 2008, in violation of Ohio Administrative Code, Rule 3745-81-60. Greenwood MHP was notified in correspondence dated February 26, 2008 of the requirement to respond in writing within 45 days, with a schedule for corrective actions to address the following:

1. OAC Rule 3745-7-09(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 records must be maintained by the Public Water System that meet the above requirements.

2. OAC Rule 3745-7-02(A)(1) states that, "Each person owning or operating a public water system, except as provided for in paragraph (B) or (E) of this rule, shall designate one or more operator of record to oversee the technical operation of the public water system... Each operator of record shall have a valid certification of a class equal to or greater than the classification of the public water system, distribution system or water treatment plant."

Due to recent telephone correspondence, Clean water services is not currently placed as the operator of record for the water system as specified during the survey. A certified Class A operator must be placed in responsible charge of your water system as the operator of record and an operator notification form must be completed and submitted to Ohio EPA. The operator notification form was provided at the time of the survey.

3. Free and combined chlorine residuals are required to be conducted at the plant tap and in the distribution system daily (seven days per week) in accordance with Ohio Administrative Code (OAC) Rule 3745-83-01(G). OAC Rule 3745-83-01(I), requires submittal of an operational report no later than the tenth of the month following the month being reported. Disinfection residual measurements are required to be taken for **total** chlorine according to Ohio Administrative Code (OAC) Rules 3745-81-70 (E) at the same time routine and repeat total coliform bacterial samples are collected. The total chlorine residuals obtained are to be reported on the QOR by the 10th of the month following the end of the calendar quarter being reported.

Ohio EPA has never received these reports from the facility. Ensure these reports are completed and submitted to Ohio EPA in accordance with the above regulations.

4. OAC Rule 3745-81-27(C)(1)(a) states that, "... A DPD colorimetric test kit acceptable to the director is one that uses electronic measurement of the color development. It shall also have a digital display of the result. DPD colorimetric test kits with an analog display are not acceptable for use. An acceptable DPD colorimetric test kit shall have a method detection limit of 0.1mg/l.

A DPD colorimetric test kit that meets the above requirements must be obtained and used for the chlorine residual sampling at the water system. You stated during the survey that one had been ordered for use at the MHP.

5. 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.

6. OAC Rule 3745-85-01 requires that a community water system must prepare and maintain a written contingency plan that must be revised and updated at least annually. The Contingency Plan had not been reviewed or updated for many years and does not meet the current requirements.

Submit a copy of a complete, updated facility Contingency Plan to Ohio EPA, along with the written response to this letter.

7. OAC Rule 3745-81-21(A) states that, public water systems shall maintain a written bacteriological sample siting plan.

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 for the plan was provided at the time of the survey.

8. 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..."

Well 1 does not have an appropriate vent. Provide a screened vent that meets the specifications in OAC Rule 3745-9-05(T).

9. OAC Rule 3745-9-05(P) states that, "A well shall have a well cap or seal to prevent the entrance of water, dirt, animals, insects, or other foreign matter...Electrical conduit connections on the well cap or seal shall be threaded and sealed to prevent the entrance of insects and water."

The current well seal on well 1 has an opening around the electrical connection and the seal is not tight fitting in the casing to prevent potential contamination. The wiring must enter the well through a threaded connection and the seal must be replaced to meet the requirements above..

10. "Recommended Standards for Water Works," also known as "Ten States Standards" (TSS) Section 4.3.1.3 states, "Where chlorination is required for protection of the supply, standby equipment of sufficient capacity shall be available to replace the largest unit."

Greenwood MHP must have a back-up chlorine feed pump on hand to ensure that chlorine can be fed into the system continuously, to protect against microbiological contamination.

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.

Ms. Dawn Angel
April 30, 2008
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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

/csl

pc: Ottawa County Health Department
DDAGW, CO, attn: Dave Evans
DDAGW, NWDO file, Green Valley MHP