



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  
Village of Put-in-Bay  
Community Water System  
PWS ID# OH6203311

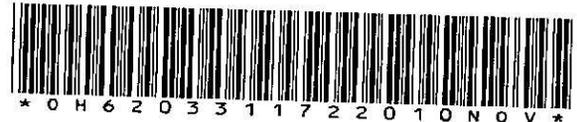
July 2, 2010

OH6203311

PUT-IN-BAY VILLAGE PWS

7/2/2010

Mr. Doug Knauer, Village Administrator  
Village of Put-in-Bay  
P. O. Box 481  
Put-in Bay, Ohio 43456



**Subject: Notice of Violation-Invalid Analysis Reporting and Incomplete Monthly Operating Reports**

Dear Mr. Knauer:

An on-site survey of the Put-in-Bay WTP Laboratory was conducted by Charles K. Vasulka of the Ohio Environmental Protection Agency on October 9, 2009. The survey was conducted to review the laboratory's capability to perform the following analyses:

- Turbidity (SM2130-B), pH (SM 4500-H+), Alkalinity (SM 2320-B), Stability (SM 2330)
- Hardness (SM 2340-C), Chlorine (SM 4500 Cl-G)

On October 19, 2009, a letter and report were transmitted to Mr. David DeZeeuw, treatment plant operator, from Mr. James Dolfi outlining deviations in equipment and/or laboratory procedures, which were discovered during the survey. The letter required that an itemized list, detailing steps to be taken to correct each deviation, be submitted to Mr. Dolfi by November 20, 2009. That letter also extended the laboratory certificates of approval to the same date. The accompanying report indicated that the certification may have been extended until April 10, 2010, if an acceptable response to the deviations was received by November 20, 2009.

A response detailing corrective steps was not received until March 22, 2010. Due to the failure to submit a timely response, certificates of approval were not issued for the analytes listed above. On May 4, 2010, Mr. Dolfi directed you to submit a lab certification application form and begin sending samples to a certified lab to be analyzed.

OAC 3745-81-28 requires that analytical results for pH, Alkalinity, Stability and Hardness may be considered only if they have been determined and reported by a laboratory certified or otherwise acceptable to the director. Additionally, in accordance with OAC 3745-81-27(C)(2) measurements of pH, Alkalinity and Alkalinity Stability shall be conducted by a person designated on a valid laboratory certificate of approval. Therefore, the data reported in the Monthly Operating Reports for pH, Alkalinity, Stability and Hardness between November 20, 2009, and May 4, 2010, are considered invalid; since the tests were not conducted by a person designated on a valid laboratory certificate and the test results were reported by a laboratory that was not certified during this period.



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OAC 3745-81-74(A) indicates that a system may use continuous turbidity monitoring if the continuous measurements are validated on a regular basis using a protocol acceptable to the director. OAC 3745-81-74(C) and 3745-81-27 require Turbidity analysis to be performed by a person designated on a valid certificate of approval. Since the continuous turbidity monitoring was not validated by a person designated on a valid certificate of approval between November 20, 2009, and May 4, 2010, the turbidity measurements during that period are also declared invalid.

Consequently, since the data reported on the Monthly Operating Reports for pH, Turbidity, Alkalinity, and Alkalinity Stability for the period between November 20, 2009, and May 4, 2010, have been declared invalid, the Monthly Operating Reports for this period have been determined to be incomplete.

In accordance with OAC 3745-81-32(D)(1)(a) a Tier 3 public notification is required for the analytes that were invalid.

If you have any questions, please feel free to contact me at (419)373-3152 or via email at [larry.gamble@epa.state.oh.us](mailto:larry.gamble@epa.state.oh.us)

Sincerely,



Larry Gamble, PE  
Engineering Supervisor  
Division of Drinking and Ground Waters

/cs

pc: David DeZeeuw, Operator  
James Dolfi, DDAGW, CO  
Charles Vasulka, DDAGW, CO  
Ottawa County Health Department  
DDAGW, NWDO File 

ec: Todd Kelleher, DDAGW, CO  
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