OhioEPA

State of Ohio Environmental Protection Agency

Northwest District Office

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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: Paulding County
Country Inn Enhanced Living
Community Water System
PWS ID # 6333512

January 25, 2008

OH6333512 COUNTRY INN ENHANCED LIVING CENTER 1/25/2008

CERTIFIED MAIL

OH6333512125 2008NOV

Mr. Russell Stoller
12651 County Road 82
Paulding, Ohio 45879-9579

Dear Mr. Stoller:

This letter is notification that Country Inn Enhanced Living has not complied with requirements issued during this Agency's last survey performed on November 13, 2007, in violation of Ohio Administrative Code, Rule 3745-81-60. Country Inn Enhanced Living was notified in correspondence dated December 7, 2007 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) states that, each public water system required to monitor for Total Trihalomethanes and Haloacetic Acids, Five (TTHMs and HAA5) shall develop and implement a sample monitoring plan. The public water system shall maintain the plan and make it available for inspection by the director and the general public. The public water system shall modify the plan as required by the director. 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 completed 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 3745-85-01 requires that a community water system must prepare and maintain a written contingency plan that must be revised and updated at least annually.

Submit a copy of the completed facility Contingency 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.

3. The surface water treatment rule (Ohio Administrative Code (OAC) Rule 3745-81-76) requires that each individual source of a public water system be evaluated to determine if the individual source is under the direct influence of surface water and therefore requires filtration and disinfection.

   On June 22, 2004, the plan approval for your system designated your new water source as Ground Water Subject to Special Conditions. The special conditions required that four consecutive calendar quarters of total coliform negative (safe) samples be obtained from the untreated / raw water (RS001) of each water source. This sampling must be completed to designate well 1 as a ground water source.

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

   Additional soil grading must be completed around the well casing to ensure that water does not pond around the well casing and potentially contaminate the water source. After regrading is completed ensure that the well casing is still at least twelve inches above finished grade to avoid possible contamination.

5. 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 OAC Rule 3745-83-01(G).

   Ensure that free and combined chlorine residuals are conducted at the entry point and in the distribution seven days per week. An operator can train weekend staff to pull the samples if he is not available on the weekends. However, the operator must ensure that the samples are being conducted and reported correctly.

6. OAC Rule 3745-81-81 and OAC Rule 3745-81-82 require that a Corrosion Control Recommendation must be submitted to Ohio EPA and at a minimum, include:

   - a cover letter,
   - a diagram of your water treatment facilities highlighting any proposed changes, and
   - a written recommendation for corrosion control that evaluates the effectiveness of:
     - ✓ alkalinity and pH adjustment,
     - ✓ calcium hardness adjustment,
     - ✓ Total Dissolved Solids, and

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

Ben Smith
Environmental Specialist 2
Division of Drinking and Ground Waters

/llr

pc: Winston Gross, Operator
Dennis Brinkman, Maintenance Supervisor
Paulding County Health Department
Dave Evans, DDAGW, CO
DDAGW, NWDO file

ec: Ralph Baker, DDAGW, NWDO
Linda Benham, DDAGW, NWDO
Ellen Gerber, DDAGW, NWDO

- ✓ addition of a phosphate- or silicate-based corrosion inhibitor at a concentration sufficient to maintain an effective residual concentration in all test tap samples.

OAC Rule 3745-91-02 requires that detailed plans be submitted for significant changes that would possibly need to be implemented due to the corrosion control recommendation.

The corrosion control recommendation and detailed plans were due on December 31, 2006. Ohio EPA has not received these submittals. Your system is in violation for failure to submit a recommendation and detailed plans for Corrosion Control by December 31, 2006.

Submit a copy of the corrosion control recommendation and detailed plans to Ohio EPA, along with the written response to this letter.

7. Director approved plans for the facility dated June 22, 2004 state that, " The sanitary isolation radius is 70 ft surrounding the well...The daily water withdrawal from the well must be less than 5000 gpd."

   Plant production reported on the monthly operating reports for the facility document that the average daily production for the last 12 months is 6,042 gallons per day which exceeds the design capacity of the system that was restricted by the sanitary isolation radius of the well.

   The current isolation radius is limited by the current building foundation. If there are no contaminate sources within the applicable portion of the building, the isolation radius can be extended.

   Submit the information from the investigation to document any extension of the isolation radius, including a site map, with the corrosion control detail plans. If contaminate sources do exist in the extended radius, contact me at 419-373-3101.

8. Director approved plans for the facility dated June 22, 2004, state that, "Two identical multimedia filters...will be operating in parallel...A flow controller will be installed to limit the filtration rate to 7 gpm so the design filtration rate of 3 gpm/ft2 is not exceeded."

   A flow controller must be installed on the influent water line to the multimedia filters in accordance with the June, 22, 2004, plans.

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.

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1. Article Addressed to:

Mr. Russell Stoller
12651 County Road 82
Paulding, Ohio 45875-9575

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Ohio EPA

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Mr. Russell Stoller
Street, Apt. No.; or PO Box No. 12651 County Road 82
City, State, ZIP+4
Paulding OH 45875-9575

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