



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Paulding County
Village of Oakwood
Community Water System
PWS ID # 6300312

May 1, 2008

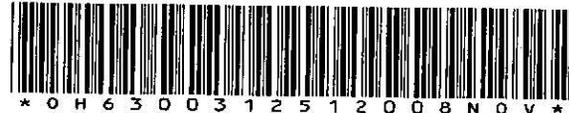
OH6300312

OAKWOOD VILLAGE WATER

5/1/2008

CERTIFIED MAIL

The Honorable Bud Henke
Mayor of the Village of Oakwood
228 N. First Street
P.O. Box 457
Oakwood, Ohio 45873



Dear Mr. Henke:

This letter is notification that the Village of Oakwood has not complied with requirements issued during this Agency's last survey performed on January 16, 2008, in violation of Ohio Administrative Code, Rule 3745-81-60. The Village of Oakwood was notified in correspondence dated February 22, 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 and includes minimum standards that must be met.

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."

Partial operation and maintenance records are being maintained by the Public Water System. The logs must meet the requirements specified above. Ensure that the date and times of arrival and departure for the operator of record and any other operator are documented in the log.

2. 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.

3. 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. Ensure that a depressurization policy is included in the contingency plan in accordance with OAC Rule 3745-85-01(D)(7).

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

4. 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.

5. A program must be instituted that periodically surveys and investigates potential cross connections (OAC Rule 3745-95-03) and documents inspections of all required backflow prevention devices at least annually (OAC Rule 3745-95-06). Ensure that all required facilities have acceptable backflow devices installed in accordance with OAC Rule 3745-95-04 and OAC Rule 3745-95-05. This includes documentation and inspection that existing wells within the village are not cross-connected to the public water system distribution.

OAC Rule 3745-95-07 specifies a prohibition for booster pumps at one, two, or three family dwellings and additional requirements for a low pressure cut-off device to be installed that will turn the pump off when pressure on the suction side of the pump drops to 10 psi or less on any other service connection.

A template ordinance is attached to this correspondence to aid in the development of a cross connection / backflow prevention program. Ohio EPA recommends that the booster pump prohibition specified in OAC 3745-95-07 be included in the ordinance.

6. OAC Rule 3745-95-09 states that, "Yard hydrants with weep holes are prohibited".

The water system must remove or replace the existing hydrant that is part of the public water system distribution system.

If replaced, the new hydrant must meet the requirements of the "American Society of Sanitary Engineers (ASSE) standard 1057, Performance Requirements for Freeze Resistant Yard Hydrants with Backflow Protection"(2001). If the system utilizes the hydrants and does not want to replace them the weep hole can be permanently sealed and blown out to avoid freezing.

7. 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 caps on wells #1, #2, and #3 have openings around the electrical connections. The wiring must enter the well through a threaded connection and be sealed to prevent the entrance of contaminants into the wells.

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..."

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

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

The well #1 casing has a small hole in the side approximately 3 to 5 inches above the finished grade. This hole must be sealed to protect the well against potential contamination.

10. OAC Rule 3745-9-04(A)(3) states that, "A public water system shall own all the land or obtain an easement or lease of the sanitary isolation radius of a public water system well, and such easement or lease shall be recorded with the county recorder."

The village only controls approximately 10' to the east of well #2. Per OAC Rule 3745-9-04(A)(3) the required 300' isolation radius must be under the control of the village through ownership, lease agreement, zoning, or easement.

11. OAC Rule 3745-9-01(B) defines and abandoned well as, "a well, test hole, or dry hole whose use has been permanently discontinued." OAC Rule 3745-9-10(A) states that, "An abandoned well shall be sealed in accordance with this rule and rule 3745-9-07 of the Administrative Code."

If the use of well #3 is permanently discontinued it must be sealed and abandoned in accordance with the rules specified above. If the well is used it must be blended with the other wells as to not exceed the combined MCL of 5 pci/L for radium. To confirm this standard sampling should occur anytime the source is used at every sampling point that is representative of all sources being used under normal operating conditions in accordance with OAC Rule 3745-81-26. Ohio EPA would recommend rehabilitation of the well to attempt to eliminate the radium MCL exceedance.

12. The high service pumps in the clearwell have been changed from vertical turbine pumps to submersible pumps. This change is a substantial change and detail plans must be submitted for the pumps and piping. This information can be included in the plans to be submitted for the proposed substantial change to the aerators-.
13. Documentation provided on April 13, 2004, shows a drain valve on the water lines from well #1 and well #2 to drain the inlet pipe to the aerators to avoid freezing of the lines. The facility owner/operator believes that there is a hole in the check valves of well #1 and well #2 to avoid freezing. Determine and provide documentation as to how the inlet water line from wells #1 and #2 currently drain.

"Recommended Standards for Water Works," also known as "Ten States Standards" (TSS) Section 4.5.5.3(g) states that, "The design shall prevent freezing of the influent riser...when the unit is not operating. If piping is buried, it shall be maintained under positive pressure." If it is determined that the aerator piping does not meet the above specifications, the piping must be altered to meet this requirement.

The influent drain should allow water to flow back into the clearwell instead of into the ground or back into the wells. Ensure to include details that meet the above design standard in the plan application that is to be submitted for the new aerator unit if the repair is not completed prior to the installation of the new unit.

14. Spill containment for the potassium permanganate must be provided in accordance with the August 16, 1999, plan approval. The approval specifies a 20 gallon tank with 20 gallon containment. However, the current tank is 45 gallons and therefore a minimum of 45 gallons of containment must be provided.
15. A chlorine leak detector must be installed in the gaseous chlorine building as required by the January 27, 2005, plan approval for the gaseous chlorine feed facility.

16. An air wash/scour system is installed on each of the four greensand filters. The August 16, 1999, plan approval documents that "An air wash system will provide an air wash rate of 3 cfm/sf." for the existing filters. The plan drawings for the January 27, 2005, plan approval still document that a 3" air/water wash influent is provided on the filters. This system must be utilized during the backwash procedures as documented in the 1999 and 2005 plan approvals.
17. Ensure that the interior and exterior of the elevated tower is inspected on a regular basis. Provide documentation from the most recent inspection that the tower is fitted with a screened vent that meets TSS 7.0.9 and that the hatches are tightly sealed and locked in accordance with TSS 7.0.8.1. In addition provide any documentation on the interior coating of the tank.
18. Provide twenty-four mesh non-corrodible screen on the clearwell vents and overflows in accordance with TSS 7.0.7(b) and TSS 7.0.9(d) to eliminate the sanitary risk that exists having direct openings into the clearwells.

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. In addition, Ohio EPA recommends documenting in this response, any progress that has been completed in regard to the recommendations specified in the February 22, 2008, survey letter.

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: John Keyes, Village Administrator
Tim Phillips, Operator of Record
Paulding County Health Department
DDAGW, CO, attn: Dave Evans
cDDAGW;NWDO file

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THE HONORABLE BUD NEWKE
MAYOR OF THE VILLAGE OF
OAKWOOD
228 N. FIRST STREET
P.O. BOX 457
OAKWOOD, OH 45873

7006 3450 0001 0667 4636

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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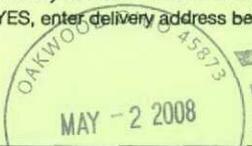
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7006 3450 0001 0667 4636

PS Form 3811, February 2004

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X Agent
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OAKWOOD, OH
Street Apt. No.,
or PO Box No. 228 N. FIRST ST. P.O. BOX 457
City, State, Zip+4
OAKWOOD, OH 45873

PS Form 3800, August 2005 See Reverse for Instructions

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