



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: Richland County
Forest Hills MHP
Community Water System
PWS ID: OH7001212
STU ID: 7057657

January 27, 2010

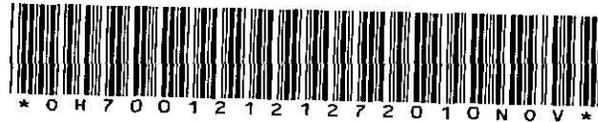
OH7001212

FOREST HILLS MHP

1/27/2010

CERTIFIED MAIL

Ms. Pamela Crain
Forest Hills MHP
710 Ashland Road
Lot #26
Mansfield, Ohio 44901



Dear Ms. Crain:

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

This letter is notification that the Forest Hills MHP has not complied with requirements issued during this Agency's last survey performed on June 10, 2009, in violation of rule 3745-81-60 of the Ohio Administrative Code. Forest Hills MHP was notified in correspondence dated August 10, 2009, to respond in writing no later than 45 days, with time frames for:

1. *OAC Rule 3745-83-01 (D)* states, "All chemicals, substances and materials added to or brought in contact with water in or intended to be used in a public water system...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)." The sodium hypochlorite currently being used is not ANSI/NSF 60 approved. Replace it with a product that conforms with ANSI/NSF 60 approved.

2. *OAC Rule 3745-81-21(A)* states, "Public water systems shall collect total coliform routine samples at sites which are representative of water throughout the distribution system according to a written sample siting plan." Forest Hills MHP is required to collect 1 routine total coliform sample per month. Forest Hills MHP failed to monitor for total coliform as required during the months of January, February, March, and May 2009.
3. *OAC Rule 3745-83-01 (G)(1)* states, "A public water system that provides water treated with chlorine shall monitor for free chlorine at least once every day that water is available to the public at each entry point to the distribution system and a representative point in the distribution system." In addition, *OAC Rule 3745-83-01 (G)(2)* states, "A public water system that provides water treated with chlorine shall monitor for combined chlorine at least once every day that water is available to the public at each entry point to the distribution system and a representative point in the distribution system."

Report the free and combined chlorine residual measurements collected daily from the entry point and from the distribution system utilizing the Plant - Distribution Monthly Operating Report (EPA Form 5002).

4. In accordance with *OAC Rule 3745-83-01 (I)(1)(c)*, the Plant - Distribution Monthly Operating Report (EPA Form 5002) must include the daily quantity of water pumped to the distribution system (plant production).
5. *OAC Rule 3745-81-70 (E)(1)* states, "Residual disinfectant level shall be measured at the same points in the distribution system and at the same time as total coliforms are sampled."

Report total chlorine residual measurements on the Total Chlorine Residual Quarterly Operating Report (EPA Form 5114).

6. *OAC Rule 3745-83-01(I)(2)* states, "The operation report shall be signed by the operator in responsible charge designated in accordance with rule 3745-7-02 of the Administrative Code and submitted to the district office no later than the tenth of the month following the month for which the report was prepared."

Ohio EPA has not received the EPA Form 5002 from Forest Hills MHP for the months of August 2008, September 2008, October 2008, November 2008, December 2008, January 2009, February 2009, March 2009, April 2009, May 2009 and June 2009. Submit these reports to Ohio EPA.

Ohio EPA has not received the EPA Form 5114 from Forest Hills MHP for the fourth quarter 2008 (October to December 2008), first quarter 2009 (January to March 2009) and second quarter 2009 (April to June 2009). Submit these reports to Ohio EPA.

7. *OAC 3745-7-02 (A)(1)* states, "Each person owning or operating a public water system ...shall designate one or more operator of record to oversee the technical operation of the public water system or each water treatment plant and distribution system within the public water system." The Forest Hills MHP water system does not currently have an operator of record holding the correct level of certification and is in violation. Complete the attached Operator of Record Notification Form and return it to the Operations Section, Division of Drinking and Ground Waters, Ohio EPA, P.O. Box 1049, Columbus, OH 43216-1049.

8. *OAC Rule 3745-85-01 (B)* states, "Each community water system shall prepare and maintain a written contingency plan for providing safe drinking water to its service area under emergency conditions." *OAC Rule 3745-85-01 (D)(3)* states, "The contingency plan shall contain a determination of not less than ten of the most likely emergencies that will affect the water system and a description of the procedures to be followed and actions necessary to provide service during the emergencies. For systems serving fewer than one thousand five hundred people, the following emergency circumstances shall be included in such outline: (a) Short term power failure (time of interruption less than two hours); (b) Extended power failure (two hours or more); (c) Pump or motor failure; (d) Loss of water from a well or other water source; (e) Major water main break; (f) Unplanned absence of operator; and (g) Contamination of source water including, but not limited to, releases of hazardous substances."

Prepare and maintain a contingency plan in accordance with *OAC Rule 3745-85-01*.

9. In accordance with *OAC Rule 3745-7-09 (A)*, the owner and operator of record of a public water system shall maintain or cause to be maintained operation and maintenance records for each public water system, water treatment plant within a public water system and treatment works. Some of the formats in which records may be maintained include, but are not limited to, hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs. In accordance with *OAC 3745-7-09 (A)(3)*, at a minimum, the following information shall be recorded: (a) Identification of the public water system, sewerage system, or treatment works;

Ms. Pamela Crain
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(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. In addition, *OAC Rule 3745-7-09 (A)(2)* states, "The records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel."

Comply with the recordkeeping requirements and responsibilities of a certified operator in accordance with *OAC Rule 3745-7-09*.

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 419-373-3105.

Sincerely,



Curtis Eldridge
Environmental Specialist 2
Division of Drinking and Ground Waters

/llr

pc: Richland County Health Department
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DDAGW-NWDO File
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Sent To
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