



State of Ohio

OH7401312

BROOK PARK ESTATES MHP PWS

12/18/2007

Nor

TELE

347 North Dunbridge Road
Bowling Green, OH 43402-9398



* 0 H 7 4 0 . 1 3 1 2 1 2 1 8 2 0 0 7 N O V *

Governor
Governor
Director

Re: Seneca County
Brook Park Estates MHP
Community Water System
PWS ID# 7401312

December 18, 2007

Mr. Michael Malone
Brook Park Estates MHP
2400 S. Twp. Rd. 119
Tiffin, Ohio 44883

Dear Mr. Malone:

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

This letter is notification that Brook Park Estates MHP has not complied with requirements issued during this Agency's last survey performed on September 21, 2007, in violation of Ohio Administrative Code, Rule 3745-81-60. Brook Park Estates MHP was notified in correspondence dated October 12, 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.

A template copy of a Disinfectants / Disinfection Byproducts Sample Monitoring Plan was provided to the Owner. Submit a completed copy of the facility specific Disinfectants / Disinfection Byproducts Sample Monitoring Plan to Ohio EPA, along with the written response to this letter.

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

Update the existing 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.

3. 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 on the well cap that meets the specifications in OAC Rule 3745-9-05(T).

4. 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 cap has an opening in that can allow contamination to enter the well. The cap must be sealed to prevent the entrance of contaminants.

5. 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.

Operation and maintenance records must be maintained by the Public Water System. 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."

6. OAC Rule 3745-83-01(D) states that, "All chemicals, substances, and materials added to or brought in contact with water in or intended to be used in a public water system or used for the purpose of treating, conditioning, altering, or modifying the characteristics of such water 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).

Mr. Michael Malone
December 18, 2007
Page Three

The bleach used as the disinfectant for the system must be NSF approved. Ensure that an NSF approved Sodium hypochlorite solution is used and that if the concentration varies greatly from the current 6.0 % Clorox brand Chlorine that is being used, the dosage is adjusted accordingly.

7. TSS Section 7.2.4 specifies that, each hydropneumatic tank must have a drain and pressure gauge.

Install drains and pressure gauges on both of the hydropneumatic tanks used at the facility.

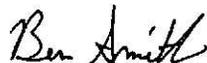
8. Ten States Standard (TSS) 7.2.3 states that, "The hydropneumatic tank(s) shall have bypass piping to permit operation of the system while the tank is being repaired or painted."

The second hydropneumatic tank is plumbed so it can be shut-off and worked on without disruption to the system the first tank does not allow for repair or replacement without turning the pump off in the well. Add a shut off valve for the front tank.

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 419-373-3101 or via Email at ben.smith@epa.state.oh.us.

Sincerely,



Ben Smith
Environmental Specialist 2
Division of Drinking and Ground Waters

/lb

pc: Seneca County Health Department
DDAGW, CO, attn: Dave Evans
~~DDAGW, NWDO File, Brook Park Estates~~