



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
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: Richland County
Omni Source Corporation
NTNC Water System
PWS ID#: OH7047012
LEAD / COPPER

OH7047012 OMNI SOURCE CORPORATION

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ACTION REQUIRED

February 8, 2008

Mr. Jim Cross
Omni Source Corporation
1500 Old Bowman Street Road
Mansfield, Ohio 44903

Re: **Notice of Violation:**
Lead and Copper Rule Treatment Technique –
Failure to monitor for and report some or all Water Quality Parameters

Dear Mr. Cross:

Omni Source Corporation public water system exceeded the **Lead Action Level** during the 2005-2007 compliance period (June 1 – September 30, 2007 sampling period) and was, therefore, required to perform additional steps to remain in compliance with the lead and copper rules in the Ohio Administrative Code (OAC).

Omni Source Corporation is in violation of the OAC for failure to monitor for and report Water Quality Parameters by December 31, 2007 and January 10, 2008, respectively.

Actions required as a result of the above violation:

1. **Monitor for and report Water Quality Parameters, according to the attached instructions (*Water Quality Parameter and Lead & Copper Monitoring*), immediately.**
2. **Notify the people served by this water system.** Within 30 days issue the enclosed public notice in accordance with OAC, Rule 3745-81-32 by the following method(s) to reach all persons served. The appropriate methods for your system are listed below under the **Non-Transient Non-Community (NTNC)** column.

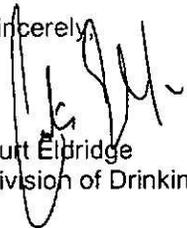
Community	Transient or Non-Transient Non Community
<ul style="list-style-type: none"> • Mail or other direct delivery to each customer • If necessary to reach all persons regularly served, use other notification methods also, such as newspaper publication, public posting or Internet posting 	<ul style="list-style-type: none"> • Posting in conspicuous locations, such as bulletin boards, restrooms, drinking fountains, vending areas; • Mail or other direct delivery to each customer • Send to parents or guardians of children at schools or day care facilities • E-mail, newsletters or newspaper
<p>Posted notices must remain in place for as long as the violation exists, but in no case for less than seven days (even if the violation is resolved). The language in italics on the enclosed public notice is mandatory and must be included, as written. Do not make changes to the public notice without consulting with Ohio EPA beforehand.</p>	

Mr. Jim Cross
February 8, 2008
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3. Within **10 days** of completing Step 2, fill out the attached verification form and send it, along with a copy of the public notification issued, to the Northwest District Office.

If you have any questions concerning the requirements in this letter or need to request technical assistance, please feel free to contact me at 419-373-3105.

Sincerely,



Curt Eldridge
Division of Drinking and Ground Waters

/llr

Enclosures: Water Quality Parameter and Lead & Copper Monitoring
Form EPA 5108
Tier 2: LCR WQP Public Notice
Public Notice Instructions and Verification Form

pc: Richland County Health Department
Toni Buchanan, DDAGW-CO
DDAGW, NWDO File

Water Quality Parameter and Lead & Copper Monitoring

I. Water Quality Parameters

All water systems that exceed the lead or copper action level must also monitor water quality parameters in the distribution system and at each entry point to the distribution system in accordance with Ohio Administrative Code rule 3745-81-87. **Water samples must be collected and analyzed for water quality parameters during the same compliance period the water system exceeded the lead or copper action level.** Water quality parameter monitoring consists of flushing the tap, then collecting and analyzing water samples for:

- pH
- temperature
- alkalinity
- calcium
- conductivity
- orthophosphate (required only when a phosphate compound is used)
- silica (required only when a silicate inhibitor is used)

A. Distribution System Samples

Each distribution system site must be sampled **TWICE**. The number of distribution sites at which a water system must take water quality parameter samples depends on the number of people served, as shown:

Population Served	Number of Sites
> 100, 000	25
10,001 - 100,000	10
3301 - 10,000	3
501 - 3300	2
< 501	1

Tap samples shall be representative of water quality throughout the distribution system taking into account the number of persons served, the different sources of water, the different treatment methods employed by the system, and seasonal variability. This tap sampling is not required to be conducted at taps targeted for routine lead and copper sampling.

B. Entry Point Samples

Each entry point to the distribution system must be sampled **TWICE** for water quality parameters.

Samples collected at the entry point(s) to the distribution system shall be from locations representative of each water source after treatment. If your system draws water from more than one water source and the sources are combined before distribution, monitor at each sampling point during periods of normal operating conditions, that is, when water is representative of all sources being used.

II. Entry Point Monitoring for Lead and Copper

A. Monitoring

Water systems that exceed the lead or copper action level must also monitor for lead and copper at each entry point to the distribution system. **Water samples for lead and copper analyses should be collected during the same compliance period that the water system exceeded the action level.** Flush the sampling location before collecting the sample.

B. Source Water Treatment Determination

Source water treatment may be required based on the results of the entry point monitoring for lead and copper. Ohio EPA will make this determination based on the following:

Source Water Treatment Guidelines	Entry Point Monitoring Results	
	Lead ($\mu\text{g/l}$)	Copper ($\mu\text{g/l}$)
Not necessary	≤ 5	≤ 200
Optional	5 - 10*	200 - 800
Recommended	10 - 15	800 - 1300**
Required	> 15	> 1300

* Source water treatment is recommended if the corrosion control treatment is at or near optimal and the lead action level is still exceeded.

** If the copper action level is exceeded, source water treatment may be required when corrosion control treatment is unlikely to reduce copper levels to less than the action level.

III. Reporting

Use EPA form 5108 for reporting both water quality parameters and entry point lead and copper results. Attach laboratory analytical results with pertinent data.

**PUBLIC NOTICE INSTRUCTIONS AND VERIFICATION FORM FOR
NON-COMMUNITY PUBLIC WATER SYSTEMS WITH TIER 2 VIOLATIONS**

The owner or operator of a non-community public water system with a Tier 2 violation or situation shall notify the persons served by the public water system as soon as practical but **no later than 30 days** after the system learns of the violation. Public notice shall be repeated every 3 months as long as the violation or situation persists.

I HEREBY CERTIFY THAT THE PUBLIC WAS NOTIFIED BY THE FOLLOWING METHOD(S) INDICATED BELOW, AS DESCRIBED IN THE OHIO ADMINISTRATIVE CODE RULE 3745-81-32:

Required Method of Public Notification	Actual Method of Public Notification
<p>Use one or more of the following methods to reach all persons served by the public water system:</p> <ol style="list-style-type: none"> Public notice issued by posting in conspicuous locations throughout the distribution system (required to remain posted for as long as the violation exists, but in no case less than 7 days) Public notice issued by mail or other direct delivery to each customer and service connection (where known). 	<p>Describe actual methods used to notify public of the violation:</p> <p>1A. Dates of posting _____ 1B. Locations of posting _____ _____</p> <p>2. Date of mailing/delivery _____</p>
<p>Schools and Day-Care Facilities must notify parents or guardians of children being served by methods besides posting, such as a newsletter, e-mail notice, or direct mailing</p>	<p>A. Method(s) _____ _____</p> <p>B. Date(s) _____</p>
<p>If the above methods do not reach all persons served, also use any other method reasonably calculated to reach other persons served by the system (e.g. publication in a local newspaper or newsletter, use of e-mail to notify employees or students, or delivery of multiple copies to central locations).</p>	<p>A. Method(s) _____ _____</p> <p>B. Date(s) _____</p>

Please check if the public notice used was provided by Ohio EPA (other side of this form) or another acceptable notice was used:

_____ A public notice as shown on the other side of this sheet was issued without changes.

_____ A different public notice was issued. **INCLUDE A COPY OF THE PUBLIC NOTICE.**

 Signature of Responsible Official Date

 Printed Name and Title of Responsible Official

Omni Source Corporation
 PUBLIC WATER SYSTEM
 PWSID NUMBER: **OH7047012**
 COUNTY NAME: **Richland**

<p><u>For Ohio EPA use only</u> Date PN Received: _____</p>	<p>VIOLATION TYPE: 59 S3 CONTAMINANT: Lead and Copper COMPLIANCE PERIOD: January 1, 2005 – December 31, 2007 Triennial Period</p>
<p>PN acceptable: PN not acceptable:</p>	

DRINKING WATER NOTICE

Omni Source Corporation Water Contains High Levels of Lead

FAILURE TO IMPLEMENT TREATMENT TECHNIQUE REQUIREMENTS

We routinely sample water at consumers' taps for lead and copper. The tests show lead levels in the water above the limit, or "action level," so we are required to conduct additional monitoring. The Omni Source Corporation water system failed to monitor and report for some or all water quality parameters by December 31, 2007 and January 10, 2008, respectively as required by Ohio EPA.

What should I do?

Listed below are some steps you can take to reduce your exposure to lead or copper:

- Call us at the number below to find out how to get your water tested for lead and copper.
- Find out whether your pipes contain lead, copper, or lead solder.
- Run your water for 15 - 30 seconds or until it becomes cold before using it for drinking or cooking. This flushes the pipes of standing water which may contain higher levels of lead and copper.
- Don't cook with or drink water from the hot water tap; lead and copper dissolve more easily into hot water.
- **Do not boil your water to remove lead or copper.** Excessive boiling water makes them more concentrated – they remain when the water evaporates.

What does this mean?

Typically, **lead** enters water supplies by leaching from lead or brass pipes and plumbing components. New lead pipes and plumbing components containing lead are no longer allowed for this reason; however, many older homes may contain lead pipes. Your water is more likely to contain high lead levels if water pipes in or leading to your home are made of lead or contain lead solder.

Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure.

What happened? What is being done?

This is not an emergency. If it had been, you would have been notified immediately. We are preparing to collect our samples for water quality parameters as soon as possible.

For more information, please contact _____
name of contact

at _____ or _____
phone number mailing address

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

PWSID#: OH7047012 Date distributed: _____