OhioEPA
State of Ohio Environmental Protection Agency

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Ted Strickland, Governor
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OH7448712 SOUTHERN REGION INDUSTRIAL REALTY, INC 1/15/2010

OH7448712115 2010NOV

Re: Seneca County
Norfolk Southern
Nontransient Noncommunity Water System
PWS ID#: OH7448712
LEAD / COPPER

ACTION REQUIRED

REVISED

January 15, 2010

Mr. Robert Shedrick
Southern Regional Industrial Realty, Inc.
3101 N. Twp. Rd. 47
Fostoria, OH 44830

Re: Exceedance of the action level for lead

Dear Mr. Shedrick:

We have reviewed your lead and copper tap water monitoring report received on December 28, 2009, the results are summarized below. Your lead and copper monitoring report indicates that the Norfolk Southern Corp. exceeded the lead action level. Because the lead action level was exceeded, the Norfolk Southern Corp. must take the following actions:

- Conduct water quality parameter monitoring **(Complete by March 31, 2010, report due April 10, 2010);**
- Complete corrosion control recommendation and source water treatment recommendation along with detail plans if required **(Due June 30, 2010);**
- Complete a public education program regarding lead in drinking water **(Complete by February 28, 2010, verification form due March 10, 2010);**
- **(Optional)** Complete first round of initial lead and copper monitoring **(January 1 – June 30, 2010, report due July 10, 2010)**

Summary of Lead and Copper Tap Monitoring

	Annual
Compliance Period:	2009
Monitoring Period:	October 1 – December 31, 2009
Population:	125
Sampling Sites Required:	10
Sampling Sites Reported:	10

	90th Percentile Concentration (µg/l)	Action Level (µg/l)	Action Level Exceeded?
Lead:	43.5	15	Yes
Copper:	280	1300	No

We suggest a meeting with you to discuss your required actions as soon as possible.

Deadlines and supplemental forms and information for the required actions listed below are included in the enclosures to this letter.

Required actions:

1. ***Water Quality Parameter & Entry Point Monitoring (OAC rules 3745-81-87 and 88)***

By March 31, 2010, collect samples for Water Quality Parameters and Lead and Copper in the distribution system and at the entry point to the distribution. The Water Quality Parameter and Lead and Copper Report (EPA Form 5108) must be submitted to Ohio EPA by April 10, 2010. See the enclosure entitled "Water Quality Parameter and Lead and Copper Monitoring" for details.

2. ***Corrosion Control Recommendation (OAC rules 3745-81-81 and 3745-81-82)***

By June 30, 2010, submit a Corrosion Control Recommendation to this office. At a minimum, the Recommendation must 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, and
  - addition of a phosphate- or silicate-based corrosion inhibitor at a concentration sufficient to maintain an effective residual concentration in all test tap samples.

Additional guidance, called *Lead and Copper Rule Guidance Manual, Volume II: Corrosion Control Treatment* (document No. PB-93-101533), can be obtained by calling the National Technical Information Service at 1-800-553-NTIS.

3. ***Source Water Treatment Recommendation (OAC rules 3745-81-80 and 3745-81-83)***

By June 30, 2010, submit a Source Water Treatment Recommendation (Recommendation) to this office.

The Recommendation must evaluate whether or not treatment is needed to reduce the levels of lead and copper in the source water at the entry point to the distribution system. The levels of lead and copper in the source water should be determined by taking a sample at the entry point to the distribution system after flushing the tap at that location. It is suggested that this sample be taken at the same time the water quality samples are taken. The instructions for entry point monitoring for lead and copper are included in the enclosure entitled "Water Quality Parameter and Lead and Copper Monitoring."

Depending upon the results of the entry-point water monitoring it may be determined that source water treatment is required to minimize lead or copper levels in the water being delivered to the user's tap (distribution system). Options for source water treatment include: ion exchange, reverse osmosis, lime softening and coagulation/filtration. The Recommendation must include an evaluation of the options for treatment and whether or not treatment is needed.

4. ***Detail Plan Submittal (OAC rule 3745-91-02)***

If significant changes to your water system are needed to implement the Corrosion Control Recommendation and/or Source Water Treatment Recommendation (typically installation of treatment), detail plans for those changes are due at the same time as the Corrosion Control Recommendation and/or Source Water Treatment Recommendation (June 30, 2010).

The detail plans must be prepared and signed by an engineer with a professional engineer's (P.E.) license. Because of the relationship between the detail plans and both the Corrosion Control Recommendation and Source Water Treatment Recommendation, you may wish to consider having your engineer prepare your Corrosion Control Recommendation and Source Water Treatment Recommendation as well.

5. ***Public Education for Lead (OAC rule 3745-81-85)***

By February 28, 2010, you must deliver public education materials to consumers of the water at your public water system. Within 10 days of distribution, you must also return to this office a copy of the public education materials distributed and *Verification That Public Was Notified For Public Education* Form (copy enclosed) verifying that the materials were distributed as required. See the enclosure "*Public Education Requirements*" for details.

U.S. EPA has additional information about lead in drinking water at http://www.epa.gov/safewater/lead/index.html.

Optional Monitoring

A public water system exceeding an action level for the **first time** may use the results from two six-months additional (optional) lead and copper monitoring and delay *installation* of the treatment described in the Corrosion Control or Source Water Treatment Recommendation described above (water quality parameter and entry point monitoring, the corrosion control recommendation and source water treatment recommendation are still required).

If your water system exceeds the action level for either lead or copper in the future, you will need to resume implementation of corrosion control and/or source water treatment.

Contact this office immediately if you are considering conducting this optional monitoring. This letter is the **only notification** you will receive regarding the ability to conduct this monitoring; it will not be reflected on your next Chemical Monitoring Schedule.

- For the results to be usable, the ninetieth percentile values for lead and copper must not exceed their respective action levels during the two monitoring periods described below.

- You must use the same number of sites and the same locations (unless corrections are needed) that were sampled during the **very first six-month** lead and copper monitoring at your system. If you are not able to gain entry to a sampling site, you may select another sampling site as long as the new site meets the same targeting criteria and is within reasonable proximity to the original site. Lead and copper samples (first draw) must be collected **after the water has not run for at least six hours** (residential building samples must be collected from the cold water kitchen tap or the cold water bathroom sink tap). You must collect lead and copper samples from at least 10 distribution system taps.

- Monitoring would have to begin during the **next available** monitoring period (January 1 through June 30, 2010). Reports are due to Ohio EPA by July 10 for the January through June monitoring period and January 10 of the following year for the July through December monitoring period, respectively.

- Report forms 5105, 5106, and 5107 are enclosed.

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)-373-3152.

Sincerely,

Larry Gamble, P.E.
Engineering Supervisor
Division of Drinking and Ground Waters

/lb

pc: David Stover
Ann Scott - IFM
Seneca County Health Department
Toni Buchanan, DDAGW-CO
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DDAGW, NWDO File