



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

OH7044412 HARP, V F AND SONS, INC

65 05/14/08



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Re: Richland County
V. F. Harp & Sons
NTNC Water System
PWS ID#: OH7044412
LEAD / COPPER

May 14, 2008

ACTION REQUIRED

Mr. Lee Harp
V.F. Harp & Sons
1236 Park Avenue East
Mansfield, Ohio 44905

**Re: Notice of Violation - Lead and Copper Rule Treatment Technique:
Failure to submit Detail Plans for Corrosion Control Treatment and
Distribute Public Education Materials**

Dear Mr. Harp:

V.F. Harp & Sons public water system exceeded the **Lead Action Level** during the June-September 2003 monitoring period and was, therefore, required to perform additional steps to remain in compliance with the lead and copper rules specified in the Ohio Administrative Code (OAC).

V.F. Harp & Sons is in violation of OAC, Rule 3745-81-81 and 3745-81-85 for failure to:

- submit detail plans for an orthophosphate feed system by December 15, 2006. The Corrosion Control Recommendation to feed orthophosphate was approved December 4, 2006; a copy is attached.
- distribute public education materials for lead by the December 10, 2007 deadline.

Actions required as a result of the above violations:

Detail Plans

- **Submit detail plans for an orthophosphate feed to this office by June 15, 2008.** The detail plans must be prepared and signed by an engineer with a professional engineer's (P.E.) license.

Public Education

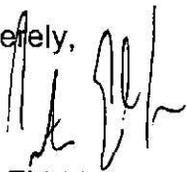
- **Distribute public education materials for lead immediately.** As long as V.F. Harp & Sons exceeds the lead action level, public education information must be distributed once every twelve months, based on the original deadline by December 10th. This is different from, and in addition to, the requirement to issue public notification as described below.
- Within **10 days** of completing Step 1, fill out the attached Verification that the Public was Notified (for Public Education) form and send it, along with a copy of the **exact** public education materials distributed, to the Northwest District Office.

Public Notification

- **Issue public notification:** Within 30 days of the date of this letter, issue public notification as required by OAC rule 3745-81-32. An example Drinking Water Notice is enclosed.
- Within **10 days** of completing Steps 1 and 2, fill out the attached Verification Form for Tier 2 violations and send it, along with a copy of the Drinking Water Notice issued, to the Northwest District Office.

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

Sincerely,



Curt Eldridge
Division of Drinking and Ground Waters

JW/llr

Enclosures: Drinking Water Notice
Public Notice Instruction and Verification Form – Tier 2
Lead and Copper Public Education Materials
Verification that the Public was Notified for Public Education

pc: Richland County Health Department
Toni Buchanan, IMS, DDAGW, CO
DDAGW, NWDO w/attachments

**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> <p>1. 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). Schools should also send a copy of the notice to the parents of all students.</p> <p>2. Public notice issued by mail or other direct delivery to each customer and service connection (where known).</p>	<p>Describe actual methods used to notify public of the violation:</p> <p>1A. Dates of posting 1B. Locations of posting 1C. Date of notice to parents 2A. Date of mailing/delivery</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) 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

V. F. Harp & Sons
PUBLIC WATER SYSTEM
PWSID NUMBER: OH7044412
COUNTY NAME: Richland

For Ohio EPA use only
Date PN Received: _____

PN acceptable: PN not acceptable:

VIOLATION TYPE: **57 – Detail Plans**
CONTAMINANT: **Lead and Copper**
COMPLIANCE PERIOD: 2000-2003
Detail Plans due 12-15-06

VIOLATION TYPE: **65 – Public Education**
CONTAMINANT: **Lead and Copper**
COMPLIANCE PERIOD: 1-1-2007 – 12-31-2007

DRINKING WATER NOTICE

V. F. Harp 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 make a recommendation for the installation and operation of optimal corrosion control treatment. This treatment helps prevent lead in the pipes from dissolving into the water. V. F. Harp & Sons is required to distribute public education materials for lead to consumers of our water.

- ❖ The V. F. Harp & Sons water system failed to prepare and submit detail plans for a orthophosphate feed system by December 15, 2006 as required by Ohio EPA.
- ❖ The V. F. Harp & Sons water system failed to distribute public education materials by December 10, 2007 as required by Ohio EPA.

What should I do?

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

- Call us at the number below to find out how to get your water tested for lead.
- 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.
- Don't cook with or drink water from the hot water tap; lead dissolves more easily into hot water.
- **Do not boil your water to remove lead.** 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 is being done?

This is not an emergency. If it had been, you would have been notified immediately. We are preparing detail plans for installation of a Corrosion Control feed system for submittal to Ohio EPA by June 15, 2008. Public Education material was distributed on _____.

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#: OH7044412 Date distributed: _____

**PUBLIC EDUCATION REQUIREMENTS
FOR NON-TRANSIENT NON-COMMUNITY PUBLIC WATER SYSTEMS
(or SIMILAR COMMUNITY PUBLIC WATER SYSTEMS)**

When a water system exceeds the lead action level of 15 µg/L, Ohio Administrative Code rule 3745-81-85 requires the water system to issue public education materials to consumers of their water by the following methods:

- a. post informational posters containing the information in Attachment OEPA-PE4 on lead in drinking water in a public place or common area in each of the buildings served by the water system;
- b. distribute informational pamphlets and/or brochures containing the information in Attachment OEPA-PE4 on lead in drinking water to each person served by the water system.
 - *For schools this means includes providing a copy to each employee and the parents or guardians of each student.*
 - *For nursing homes, county homes, youth camps and other establishments with residents, this includes providing a copy to each employee and the family of each resident.*
 - *For other types of places of employment, this includes providing a copy to each employee.*

Items "a" and "b" must be re-issued every 12 months for as long as the water system exceeds the lead action level.

Please note that in the enclosed attachment there are several locations where your water system-specific information must be added. These locations are indicated in *italics*.

Copies of the public education materials issued, a listing of to whom the public education materials were given, and the dates the public education was issued, must be sent to your Ohio EPA district office.

U.S. EPA also has a web site with templates for public education that you might find useful. This site is located at: <http://www.epa.gov/safewater/lcrr/implement.html>

PUBLIC EDUCATION FOR LEAD ACTION LEVEL EXCEEDANCE

INTRODUCTION

The United States Environmental Protection Agency (USEPA) and _____ *[insert name of water supplier]* are concerned about lead in your drinking water. Some drinking water samples taken from this facility have lead levels above the USEPA action level of 15 parts per billion (ppb), or 0.015 milligram of lead per liter of water (mg/L). Under Federal law we are required to have a program in place to minimize lead in your drinking water by _____ *[insert date when corrosion control will be completed for your system]*. This program includes corrosion control treatment, source water treatment, and public education. We are also required to replace the portion of each lead service line that we own if the line contributes lead concentrations of more than 15 ppb after we have completed the comprehensive treatment program. If you have any questions about how we are carrying out the requirements of the lead regulation please give us a call at _____ *[insert water system's phone number]*. This brochure explains the simple steps you can take to protect yourself by reducing your exposure to lead in drinking water.

HEALTH EFFECTS OF LEAD

Lead is found throughout the environment in lead-based paint, air, soil, household dust, food, certain types of pottery, porcelain and pewter, and water. Lead can pose a significant risk to your health if too much of it enters your body. Lead builds up in the body over many years and can cause damage to the brain, red blood cells and kidneys. The greatest risk is to young children and pregnant women. Amounts of lead that won't hurt adults can slow down normal mental and physical development of growing bodies. In addition, a child at play often comes into contact with sources of lead contamination - like dirt and dust - that rarely affect an adult. It is important to wash children's hands and toys often, and to try to make sure they only put food in their mouths.

LEAD IN DRINKING WATER

Lead in drinking water, although rarely the sole cause of lead poisoning, can significantly increase a person's total lead exposure, particularly the exposure of infants who drink baby formulas and concentrated juices that are mixed with water. The USEPA estimates that drinking water can make up 20 percent or more of a person's total exposure to lead. Lead is unusual among drinking water contaminants in that it seldom occurs naturally in water supplies like rivers and lakes. Lead enters drinking water primarily as a result of the corrosion, or wearing away, of materials containing lead in the water distribution system and household plumbing. These materials include lead-based solder used to join copper pipe, brass and chrome-plated brass faucets, and in some cases, pipes made of lead that connect houses and buildings to water mains (service lines). In 1986, Congress banned the use of lead solder containing greater than 0.2% lead, and restricted the lead content of faucets, pipes and other plumbing materials to 8.0%. When water stands in lead pipes or plumbing systems containing lead for several hours or more, the lead may dissolve into your drinking water. This means the first water drawn from the tap in the morning, or later in the afternoon if the water has not been used all day, can contain fairly high levels of lead.

STEPS YOU CAN TAKE TO REDUCE EXPOSURE TO LEAD IN DRINKING WATER

Let the water run from the tap before using it for drinking or cooking any time the water in a faucet has gone unused for more than six hours. The longer water resides in plumbing the more lead it may contain. Flushing the tap means running the cold water faucet for about 15-30 seconds. Although toilet flushing or showering flushes water through a portion of the plumbing system, you still need to flush the water in each faucet before using it for drinking or cooking. Flushing tap water is a simple and inexpensive measure you can take to protect your health. It usually uses less than one gallon of water. Do not cook with, or drink water from the hot water tap. Hot water can dissolve more lead more quickly than cold water. If you need hot water, draw water from the cold tap and then heat it. The steps described above will reduce the lead concentrations in your drinking water. However, if you are still concerned, you may wish to use bottled water for drinking and cooking. You can consult a variety of sources for additional information. Your family doctor or pediatrician can perform a blood test for lead and provide you with information about the health effects of lead. State and local government agencies that can be contacted include: _____ *[insert the name or title of facility official if appropriate]* at _____ *[insert phone number]* can provide you with information about your facility's water supply; and The Ohio Department of Health at 614-466-1450 or the _____ *[insert the name of the city or county health department]* at _____ *[insert phone number]* can provide you with information about the health effects of lead."

**VERIFICATION THAT THE PUBLIC WAS NOTIFIED
For Public Education - Non-Community**

I HEREBY CERTIFY THAT THE PUBLIC EDUCATION MATERIAL ATTACHED WAS DISTRIBUTED TO ALL CONSUMERS OF THE DRINKING WATER BY THE METHOD(S) INDICATED BELOW AS REQUIRED BY OAC RULE 3745-81-85.

REQUIRED METHOD OF PUBLIC EDUCATION FOR NON-COMMUNITY WATER SYSTEMS	Dates Distributed
<p>Mail or hand delivery to each person served by the water system</p> <p>and</p> <p>by continuous posting in conspicuous places throughout the area served by the water system.</p> <p>Return a copy of the materials along with this verification form to your Ohio EPA district office.</p>	<p>Dates: _____</p> <p>—</p> <p>Date: _____</p>

Signature of Responsible Official Date

PUBLIC WATER SYSTEM: V F Harp & Sons

Printed Name and Title of Responsible Official

PWSID NUMBER: 7044412
COUNTY NAME: Richland

<p>For Ohio EPA use only Date PE Received: _____</p>	<p>Public Education Annual Distribution: 2008 ALE MONITORING PERIOD : June-Sept 2003</p>
<p>PE acceptable: PE not acceptable:</p>	

revised November 2005