



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director



NOTICE OF VIOLATION – ACTION REQUIRED

October 31, 2012

RJ Edwards
Edwards Realty Company
5555 Wall Street
Dublin, OH 43017

Licking County
El Rancho Mobile Home Park
COMMUNITY PWS
PWS ID: OH4500512

Dear Mr. Edwards:

The Public Water System serving El Rancho Mobile Home Park is in violation of the Ohio Administrative Code (OAC) 3745-81-60 (D) for failure to respond in writing within thirty days regarding the requirements in a sanitary survey letter. The sanitary survey letter dated September 25, 2012 included the following:

SIGNIFICANT DEFICIENCIES

During the sanitary survey inspection, the inspector identified several required items as being significant deficiencies. A significant deficiency is a deficiency (or a number of deficiencies) which causes or may cause an unnecessary risk to human health from a specific contaminant. Per OAC 3745-81-44, a responsible official of the public water system must respond, in writing, within 30 days, indicating how the system will address the significant deficiencies within 120 days or provide a corrective action schedule (for the system to address the following significant deficiencies:

1. As shown in Image #1, Well No. 1 has a significant hole in the casing. This hole is a serious health hazard as contaminants can easily enter the well and aquifer. In accordance with OAC 3745-9-05 (U) (2), a well shall be altered, modified, or repaired in accordance with OAC 3745-9-05, or a well shall be sealed in accordance with rule 3745-9-10 of the Administrative Code if:
 - (a) The pump, or any part of a well, malfunctions or is defective;or

(b) The top of the casing is buried below ground surface; or

(c) Potential or actual risk of contamination of ground water exists due to casing deterioration or the condition of the well.

A written statement from a certified well driller is required stating the structural integrity of the well casing below grade is acceptable. To make this determination, a down-hole camera capable of lateral inspection must be used. Further, if the casing is structurally sound, a proposal for the method of repair which adheres to the requirements of OAC 3745-9-05 is required before work commences. A full well analysis, 24-hour pump test, two safe bacteriological samples, and completion of a revised well log will be required should the existing well be rehabilitated.

Should the structural integrity be unacceptable or the repair of the existing well is impractical, a new water source is required. An emergency well site acceptance was performed in the field during the LSSV and enclosed is a copy of the well site approval letter, "Site Evaluation for Proposed Well No. 2."

Please be aware, any time the pressure within the distribution system drops below 20 psi, the residents should be notified of a boil advisory. Two samples are required to be tested and result total coliform and e-coli/fecal coliform negative before the boil advisory may be lifted. Our office must be notified of the boil advisory and a Depressurization Form, which is enclosed, must be completed and returned to our office.

A water system that fails to correct a significant deficiency within 120 days (or by the deadline accepted by the Director) represents a treatment technique violation and requires the water system to issue a public notice to the water consumer. The water system must include the notification in the consumer confidence report for any subsequent year until the system corrects the deficiency.

REQUIREMENTS

Per OAC 3745-81-60(D), a responsible official for the public water systems must respond, in writing, within 30 days, indicating how and on what schedule the system will address the following requirements:

1. As required by OAC 3745-9-05 (P), electrical conduit connections on the well cap or seal shall be threaded and sealed to prevent the entrance of insects and water. As shown in Image #2, the electrical conduit on Well No. 1 is not properly sealed. Please seal the electrical conduit to the well cap.

2. Also shown in Image #2, Well No. 1 also does not have a vented screen. OAC 3745-9-05 (T) requires a well vent on all well caps and seals. This vent shall be self-draining, screened with a non-corroding 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. Please provide Well No. 1 with a proper vent.
3. "Recommended Standards for Water Works" (2012) Section 5.1.9 (d) (2) requires liquid chemical storage tanks to have a receiving basin capable of receiving accidental spills or overflows without uncontrolled discharge. The sodium hypochlorite solution tank, as shown in Image #3, requires secondary containment of a volume equal to or greater than the tank itself.
4. The following is in reference to the pressure sand filters serving the public water system. Based on conversations with Mr. Britenstine, the pressure sand filters, shown in Image #4, were noted to not be in service. The tanks have also not been backwashed in a significant period of time as, based on conversations, it was uncertain whether they still hold media.
 - a. If the filters are to be used for iron and/or manganese removal, verification of the media intended for use is required from our office. Please provide sieve analysis results to our office for approval prior to media installation. Also, a means to dispose of the filter backwash water is required. Please submit a written outline as to how the filters shall be backwashed, including the rate of flow per square foot of media.
 - b. Alternatively, the filter unit vessels can be considered as contact tanks for chlorination. There was communication with Mr. Britenstine and Mr. Joe Hickman regarding this alternative. Currently, El Rancho Mobile Home Park is not designed to provide the required 30 minute contact time for disinfection. This lack of contact time was previously 'grandfathered' by our office and has been permitted at the public water system. However, if the filter units are indeed lacking media (mentioned above), they are currently providing an opportunity for chlorine contact.

If the public water system indeed desires to use these filter vessels as contact tanks for the chlorine, the interior of each vessel must be appropriately cleaned. A separate inlet and outlet

must be provided through the units. Ideally, the two filter units should be piped in series to optimize chlorine contact time.

- c. Another alternative is to fully disconnect the filter vessels and remove them from the treatment building. Please be aware, removal of the units may have a negative influence on water quality. If the filters are not to be brought to standard for iron and/or manganese removal, or are not to be used for chlorine contact, they must be disconnected from the system in accordance with OAC 3745-91-02 (E) as they are no longer in proper working order.

Please be advised OAC 3745-91-09 (B) requires community water systems which alter their water source to provide iron and manganese removal. Should El Rancho Mobile Home Park drill a new well (as referenced in Significant Deficiencies #1), part of the required raw water analysis will include iron and manganese testing. These results will be compared against the Secondary Maximum Contaminant Levels (SMCLs). If the iron content meets or exceeds 0.3 mg/L or manganese content meets or exceeds 0.05 mg/L, iron and/or manganese removal treatment will be required.

5. Please determine what service the green PVC pipe, shown in Image #5 and Image #6 provides. The pipe is located within the sanitary isolation radius of Well No. 1 and appears to be a newer installation. OAC 3745-9-04 (A)(6) prohibits potential sources of contamination to be constructed or placed within the sanitary isolation radius of a public water system well. Please clarify the purpose of this PVC pipe.
6. As shown in Image #7, a hose is connected to a sample point within the treatment building. This hose provides an opportunity for a cross connection as defined in OAC 3745-95-02. Please provide an atmospheric vacuum breaker at the hose location to prevent back syphonage from occurring.
7. The sample point shown in Image #7 has been considered the entry point, or EP001, by the system. As the pressure filters are located after this sample point, the designation of EP001 is inappropriate. Please provide an additional smooth nose sample tap located after the pressure filters and prior to the distribution system. This new location shall be considered EP001. The enclosed "Examples of Smooth Nose Sample Taps" shows examples of the appropriate style taps.

8. In accordance with OAC 3745-07-09 (A), an operator must maintain a log regarding the operation and maintenance of their public water system in such a manner as to guarantee the authenticity and accuracy of the records contained within. During the survey, it was noted the records are not being maintained in a bound book and are not being kept onsite. Records must be available onsite for twenty-four hour inspection by agency or emergency response personnel. At a minimum, the following information shall be recorded:
 - 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.

The records shall be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years. To ensure accuracy of the record, each page of the bound book should be numbered. Also, lines should not be skipped between entries.

9. In accordance with OAC 3745-81-21(A), 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. This plan is subject to review and revision by the director. Please provide a copy of the bacteriological siting plan.
10. OAC 3745-85-01 (B) requires all community water systems to have a written contingency plan for providing water in emergency situations. This contingency plan must be revised and updated as necessary, but at least annually. One

copy of the contingency plan shall be kept at the water treatment plant and another shall be kept in the water system administrator's office. The contingency plan must include all components listed within OAC 3745-85-01 (D). A copy of "OAC 3745-85-01: Contingency plans" is included.

11. In accordance with OAC 3745-96-01, each community water system shall deliver a report to its customers by July 1st annually. Each report shall contain data collected during, or prior to, the previous calendar year as prescribed in paragraph OAC 3745-96-02(D)(3).

Attached are copies of "OAC 3745-96-02: Required Report Content" and "OAC 3745-96-03: Required Additional Health Information" which explain what components must be included in the Consumer Confidence Report.

As required by OAC 3745-96-04, a copy of the completed Consumer Confidence Report and a certification form, must also be submitted to the Ohio EPA Central Office by July 1st annually. A copy of this certification form is attached.

12. In accordance with OAC 3745-83-01(I), monthly reports must be submitted to the Ohio EPA. Under paragraphs (G) and (H) of this rule, the owner or operator of a public water system is required to monitor the following, and shall prepare an operational report (MOR) for each month of operation on forms signed by the Operator of Record and submitted via EDWR:

- a. Free or combined chlorine residuals at least once every day of water that is available to the public at each entry point to the distribution system and a representative point or points in the distribution system.
- b. Information on daily water treatment and system pumpage;
- c. Total chlorine residual from the site where the required monthly Total Coliform Sample is taken.

13. It was indicated during the survey that the current Operator of Record, Mr. Eric Britenstine, intends to withdraw as the designated operator for El Rancho Mobile Home Park in the coming weeks. At that time, a new designated Operator of Record will be required. In accordance with OAC 3745-7-02 (A)(1)(b), please submit the enclosed ORC Notification Form, mailed to the attention of Mr. Andy Barienbrock, within three days of Mr. Britenstine's departure.

RJ Edwards
Edwards Realty Company
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14. As we are required to have up to date records for public water systems and their contacts, please complete the enclosed PWS Pre-Sanitary Survey Questionnaire which had not been completed prior to the sanitary survey and return it to our office.

Please respond within 15 days regarding this letter. If you have any questions, please contact your Ohio EPA representative by telephone at (614) 728-3863 or via email at katie.anderson@epa.state.oh.us.

Sincerely,



Katie Anderson, E.I.
Environmental Specialist II
Division of Drinking and Ground Waters
Central District Office

ec: CDO/DDAGW AA (State Violation)
CDO/DDAGW DOCC
eDoc