



**Environmental  
Protection Agency**

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

OH7792212 IBH MULTI PURPOSE BUILDING

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March 9, 2011

RE: SUMMIT COUNTY  
IBH MULTI-PURPOSE BUILDING  
NON-TRANSIENT NON-COMMUNITY  
LEAD AND COPPER  
PWS ID #OH7792212

Interval Brotherhood Foundation  
3445 South Main Street  
Akron, OH 44319

**SUBJECT: NOTICE OF VIOLATION OF FAILURE TO ISSUE PUBLIC EDUCATION  
MATERIALS FOR LEAD ACTION LEVEL EXCEEDANCE**

Dear Sir/Madam:

A review of our records indicates that your public water system incurred a violation of rule 3745-81-85 of the Ohio Administrative Code (OAC) for failure to distribute lead public education information on lead in drinking water to each person served by the IBH Multi-Purpose Building water system by November 29, 2010. The delivery of public education material is required whenever a public water system exceeds the lead action level.

Please note that you are still required to distribute the lead public educational materials within 30 days of receipt of this letter and submit verification of distribution to this office not more than 10 days after distribution. Public education must be distributed every 12 months as long as the water system exceeds the lead action level.

**Actions Required as a Result of the Above Violation**

Step 1	<p><b>Within 30 days</b> issue the attached public notice of the violation in accordance with rule 3745-81-32 of the Ohio Administrative Code by the following method(s) to reach all persons served by the public water system:</p> <ol style="list-style-type: none"> <li>1. Mail or other direct delivery to each customer; and</li> <li>2. Any other method reasonably calculated to reach other persons regularly served by the system.</li> </ol>
Step 2	Fill out the attached verification form and send along with a copy of the public notification issued within 10 days to the Northeast District Office of the Ohio EPA.
Step 3	Fill out the attached verification form and send along with a copy of the public education materials issued within 10 days to the Northeast District Office of the Ohio EPA.

During the June – September, 2006 third reduced annual monitoring period, the lead action level was exceeded. This exceedance required corrosion control to be designed and constructed in accordance with the Corrosion Control Recommendation that was approved on March 12, 2002. Detail plans were received on October 25, 2010 and approved by the Director on February 15, 2011.

In order to avoid any further violations, you must complete the following:

- Install corrosion control treatment equipment within two (2) months of the date of the Director's Letter of Detail Plan Approval. If the facilities are constructed before that time, Ohio EPA Northeast District Office must be notified immediately upon completion. At that time, IBH Multi-Purpose Building public water system must resume monitoring for lead and copper on a six-month basis. The first six-month monitoring period will be the January – June, 2011 period. The second six-month monitoring period will be the July – December, 2011 period.
- Once the orthophosphate feed equipment is operational, IBH Multi-Purpose Building public water system will be required to collect a sample for orthophosphate analysis by an Ohio EPA certified laboratory every two weeks. The sample results must be reported to Ohio EPA on a monthly basis using the monthly operating report Form 5002 (copy enclosed). The monthly operating report is due to Ohio EPA by the 10<sup>th</sup> of the following month. Orthophosphate levels should reflect those recommended in the approved Corrosion Control Recommendation.
- At the completion of the two six-month monitoring periods, Ohio EPA will designate optimal water quality control parameter(s) to be considered a treatment technique for the control of lead corrosion. The water quality control parameter designation(s) will be based upon the monitoring results from the above mentioned conditions.
- After OWQCPs are determined, IBH Multi-Purpose Building water system must complete another two consecutive six-month monitoring periods for lead and copper. The two six-month periods shall be July-December 2012 and January-June 2013. Monitoring results shall be reported to this office on approved Ohio EPA lead and copper reporting forms by the 10<sup>th</sup> day of the month following the end of the six-month monitoring period. Upon receipt of the monitoring results, IBH Multi-Purpose Building water system may then reduce the frequency of sampling to once per year as long as the lead and copper action levels are not exceeded.
- Any lead monitoring conducted requires a "Consumer Notice of Tap Water Results" to be issued and a verification form be sent to the Northeast District Office. Please forward an example of a notice and completed verification along with your lead and copper reporting form 5105. Please note that the notice contains required language to be distributed. Templates can be found on our Web site at: [www.epa.ohio.gov/ddagw/reporting.aspx#Forms](http://www.epa.ohio.gov/ddagw/reporting.aspx#Forms).

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If the lead action level is exceeded during future monitoring periods, the appropriate water quality parameters must be obtained, and public education must be posted. If the copper action level is exceeded, this office will notify you of additional requirements.

Please refer to the plan approval letter dated February 15, 2011 for more details and all required special conditions.

If you have any questions, please contact me at (330) 963-1227.

Sincerely,

A handwritten signature in black ink, appearing to read "Ursula Musselman". The signature is fluid and cursive, with the first name "Ursula" being more prominent than the last name "Musselman".

Ursula Musselman  
Environmental Specialist  
Division of Drinking and Ground Waters

UM:ds

enclosures: PN and Verification Form, PE and Verification Form 5002

cc: Kim Eppers, OEPA-DDAGW-NEDO  
Dan Underwood, OEPA-DDAGW-NEDO  
Ralph DeVoe