

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

November 27, 2012

RE: MAHONING COUNTY
VFW POST 7600
TNC PUBLIC WATER SYSTEM
PWS ID #OH5044112

Mr. Mike Graben
VFW Post 7600
5664 McCartney Road
Lowellville, OH 44436

**SUBJECT: GROUND WATER RULE CORRECTIVE ACTION PLAN AND
IMPLEMENTATION SCHEDULE – NOTICE OF VIOLATION**

Dear Mr. Graben:

VFW Post 7600 is in violation of the Ground Water Rule [OAC 3745-81-43(A)(4)] for failure to respond to our corrective action letter dated October 22, 2012. In that letter (enclosed), you were required to consult with Ohio EPA and submit an acceptable corrective action plan and schedule of implementation within 30 days, to deal with the *E. coli* positive results at the water system. Our records indicate that you have not met this requirement.

Ohio EPA is requiring the VFW Post 7600 to conduct corrective action according to OAC 3745-81-43. Failure to complete the corrective action may result in enforcement action.

IMMEDIATE ACTION REQUIRED:

To ensure the safety of the consumer, your system must complete a corrective actions plan, schedule of implementation, and issue a public notification to your patrons that fecal indicators have been detected in your source.

- 1. You must immediately begin to boil the water or provide bottled water for any human consumption.** Because previous samples taken contained a chlorine residual, and because of the historic *E. coli* issues, **the water must be boiled, or bottled water provided for human consumption as an interim measure until**

corrective actions have been satisfied in accordance with OAC 3745-81-43(A)(5)(b)(ii).

2. Issue the enclosed public/special notice within 24 hours in accordance with OAC Rule 3745-81-32 and 3745-81-43(A)(7) using one or more of the following methods to reach all persons served.
 - a. Hand delivery to persons served by the water system;
 - b. Posting in conspicuous locations, such as bulletin boards, restrooms, drinking fountains, vending areas;
 - *Posted notices must remain in place until corrective actions have been satisfied, and the system has been issued a Return to Compliance letter by Ohio EPA.* 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.
 - c. Another delivery method approved in writing by the director;

NOTE: Issuance of a Public Notice must be repeated every three months for as long as the violation exists, unless directed otherwise by the district office.

3. Complete the enclosed verification form within 10 days of issuing the Public Notice and mail both the 1) verification form and 2) a copy of the public notice to Ohio EPA – Northeast District Office, Division of Drinking and Ground Waters, 2110 East Aurora Road, Twinsburg, OH 44087. Include a copy of each notice distributed, published or posted.
4. You must contact the Ohio EPA – Northeast District Office within seven (7) days to discuss your corrective action plan. Your Corrective Action Plan must:
 - a. Include one or more items proposed in the Corrective Action Letter dated October 22, 2012.
 - b. Include a schedule of implementation.
 - c. Be approved by Ohio EPA.

VFW POST 7600
NOVEMBER 27, 2012
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Corrective Actions must be implemented and completed within 120 days of the date of the October 22, 2012, Corrective Action Letter (by February 19, 2013), or in accordance with an approved schedule of implementation. Failure to complete corrective actions by February 19, 2013, or in accordance with the approved schedule of implementation, may result in enforcement action that can result in fines up to \$25,000 per day.

In addition, please see the enclosed information about the *Ohio EPA Drinking Water Emergency Loan Fund (DWELF)*. If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me at this office 330-963-1164 or via e mail at christopher.maslo@epa.ohio.gov.

Sincerely,



Chris Maslo
Environmental Specialist
Division of Drinking and Ground Waters

CM:ds

enclosures: October 22, 2012, Corrective Action Letter
Tier 1/Type 20 Public Notice and Verification Form
Drinking Water Emergency Loan Fund Fact Sheet/Application

pc: Kim Ethers, Ohio EPA, DDAGW, NEDO
Ohio EPA, DDAGW-OFAS, CO
Mahoning County Health Department
Mr. Raymond Rubino, Post Commander
Ohio EPA, DDAGW-DW, NEDO, file

ec: Nancy Rice, Ohio EPA, DDAGW-DW, NEDO
Stivo DiFranco, Ohio EPA, DDAGW-DW, NEDO
Kathy Metropulos, Ohio EPA, DDAGW-DW, NEDO
Chris Maslo, Ohio EPA, DDAGW-DW, NEDO



**Environmental
Protection Agency**

Robert A. Kasich, **Governor**
Mike Taylor, **Lt. Governor**
Scott J. Balley, **Director**

October 22, 2012

RE: MAHONING COUNTY
VFW POST 7600
TNC WATER SYSTEM
PWS ID #OH5044112

Mr. Mike Graban
VFW Post 7600
5664 McCartney Road
Lowellville, OH 44436

RE: GROUND WATER RULE CORRECTIVE ACTION

Dear Mr. Graben:

In December of 2009, the Ground Water Rule was promulgated by the United States Environmental Protection Agency (U.S. EPA). The Ground Water Rule requires all ground water public water systems to conduct source water monitoring after a bacteriological sample result is total coliform positive, and take corrective actions if a subsequent sample result is E. coli positive. Your system obtained two (2) E. coli positive bacteriological samples collected on September 18, 2012, and October 15, 2012. Ohio EPA also obtained an E. coli positive sample on October 15, 2012.

An investigation of the water system was conducted on two separate dates. On September 25, 2012, Chris Maslo visited the water system, and on October 15, 2012, Chris Maslo and Katherine Springer Amey visited the water system. The findings of the investigation are enclosed with this letter.

A *Hydrogeological Sensitivity Assessment (HSA)* that was completed on October 16, 2012 indicated that the well is located in a hydrogeological setting that is considered pathogen sensitive. Potential sources of contamination include an onsite septic system approximately 50 feet east of the water well, and a probable septic system at the home on the property north of the public water system. The complete *HSA* is enclosed with this letter.

Due to the results of the *HSA* and the recent E. coli and total coliform positive sample results (see table below), Ohio EPA is requiring VFW Post 7600 to conduct corrective action according to the Ohio Administrative Code (OAC) 3745-81-43(A)(4).

Recent Bacteria Sampling Results:

Sample Collection Date	Sample ID#	Sample Tap	Result
09-18-2012	720121700	Women's Restroom	E. coli positive and Total Coliform positive
09-25-2012	720121780	Raw Tap	Total Coliform positive
10-15-2012	720121973	Raw Tap	E. coli positive and Total Coliform positive
10-15-2012	720121974	Women's Restroom	Total Coliform positive
10-15-2012	148466 (QTray)	Raw Tap	E. coli (1 colony) and Total Coliform (13 colonies)
10-15-2012	148464	Pressure Tank	Total Coliform positive

Failure to complete corrective action may result in enforcement action.

Corrective Actions

Within 30 days of this letter, VFW Post 7600 must consult with the Ohio EPA, Division of Drinking and Ground Waters, concerning the appropriate corrective action(s). An appropriate corrective action plan must be submitted along with a schedule of implementation. **Corrective actions to be considered shall include:**

1. Site-Specific Recommended Actions:

- A. **Assess the well integrity.** A down-hole camera examination of the well casing in 2008 identified corroded casing. Assess the current condition of the well casing, and whether there are any deficiencies that are allowing contaminants to enter.
- B. **Hire a well driller and/or water system specialist to identify well issues and possible sources of contamination.** Make any repairs as needed.
- C. **Consider scrubbing the well** to remove iron and sediment build-up at the bottom of the well, which may be contributing to recurring total coliform issues.
- D. **Replace the current water well, or extend the depth of the casing.**
- E. **Do not shock well prior to sample collection.** Continuously chlorinating water wells leads to decreased pump life and causes iron to precipitate out and settle on the bottom of the well, which can cause recurring total coliform issues. This also masks problems there may be with the well and distribution system, which is illegal. Lastly, it may lead to premature excessive corrosion of the well casing.

- F. **Keep overgrown vegetation away from the wellhead** by mowing or trimming often adjacent to the well casing.
- G. **Properly disinfect the well and distribution system** after any work is completed on the well or water system. Add a cup of chlorine to the salt tank to ensure that all treatment equipment is disinfected.

2. Provide an alternate source of water from an approved Ohio EPA source.

Examples of this would include but are not limited to:

- A. Connecting to a regional water supply;
- B. Providing hauled water;
- C. Install a new well.

3. Eliminate the source(s) of contamination.

The health department can be consulted to determine whether the septic systems in the area are working properly. If working properly, this would eliminate a potential source of contamination.

4. 4-Log Treatment.

Provide treatment that reliably achieves at least 4-log treatment of viruses (using inactivation, removal, or a director-approved combination of 4-log virus inactivation and removal) before or at the first customer for the ground water source. The installation of 4-log treatment of viruses would require, at a minimum, installation of chlorination with retention, a Class 1 certified operator, daily testing and monthly report submission.

Following review of the corrective action plan by the Ohio EPA, VFW Post 7600 will be advised of either its acceptance or any changes that may be required prior to its acceptance. **VFW Post 7600 is required to complete the agreed upon corrective actions or be in compliance with a schedule of implementation agreed upon with Ohio EPA within 120 days of the date of this letter.**

VFW Post 7600 must remain in compliance with an approved corrective action plan, including the schedule of implementation. Noncompliance will result in the issuance by the Ohio EPA of a Treatment Technique violation with public notice requirements, and subject the public water system to potential additional enforcement action.

Additional Requirements

1. Boil Alert.

Continue to boil the water used for human consumption until one set of four (4) samples labeled "repeat" are total coliform negative.

2. Required Routine Sampling.

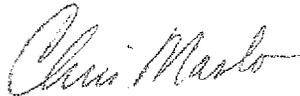
Collect five (5) routine samples in October 2012.

3. Public Notice Requirements.

The public notice currently in place which indicates that the water must be boiled or that bottled water must be used, must remain in effect until the Ohio EPA has determined that the corrective actions have been satisfied.

If you have any questions regarding this letter, or any other matter involving your water system, feel free to contact me at 330-963-1164 or via email at christopher.maslo@epa.ohio.gov.

Sincerely,



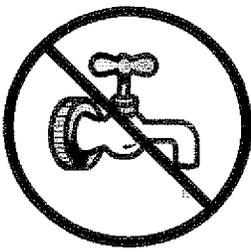
Christopher Maslo
Environmental Specialist
Division of Drinking and Ground Waters

CM:ds

enclosures: October 16, 2012, Hydrogeological Sensitivity Assessment
September 25, 2012, Limited Scope Site Visit
October 15, 2012, Limited Scope Site Visit

pc: Kim Ethers, Ohio EPA, DDAGW-DW, NEDO
Ohio EPA, DDAGW-OFAS, CO
Mahoning County Health Department
Ohio EPA, DDAGW-DW, NEDO file
Raymond Rubino, Post Commander, 4303 Oak St., Lowellville, OH 44436

ec: Nancy Rice, Ohio EPA, DDAGW-DW, NEDO
Stivo DiFranco, Ohio EPA, DDAGW-DW, NEDO
Kathy Metropoulos, Ohio EPA, DDAGW-DW, NEDO
Dave Maschak, Ohio EPA, DDAGW-DW, NEDO
Chris Maslo, Ohio EPA, DDAGW-DW, NEDO



DRINKING WATER NOTICE

Failure to consult with Ohio EPA and submit an acceptable corrective action plan and schedule of implementation within 30 days after indication of E. coli/fecal confirmed water sample results

Sampling conducted on September 18th and October 15th, 2012 for our water system showed fecal bacteria were found in our source (well). We were directed by Ohio EPA on October 22, 2012 to correct the problem. As our customers, you have a right to know what happened and what we are doing to correct this situation. As required by Ohio EPA's Ground Water Rule, we were required to contact the Ohio EPA to develop a plan to correct this issue. However, we failed to contact the Ohio EPA or implement a corrective action plan within the established deadline and have violated a requirement of the Ground Water Rule.

What should I do?

DO NOT DRINK THE WATER WITHOUT BOILING IT FIRST. Bring all water to a boil, let it boil for at least one minute, and let it cool before using, or use bottled water. Boiled or bottled water should be used for drinking, making ice, brushing teeth, washing dishes, and food preparation until further notice. Boiling kills bacteria and other organisms in the water.

Fecal coliforms and E. coli are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short term effects, diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, and people with severely compromised immune systems.

The symptoms above are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice. People at increased risk should seek advice about drinking water from their health care providers.

What does this mean?

Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and associated headaches. Failure to correct the deficiency according to the established schedule prolonged the risk of fecal contamination of our source water.

What is being done?

We are investigating and taking the necessary steps to correct the problem as soon as possible. For more information, please contact Mike Graben or Ray Rubino at 330-536-6375 or 330-536-6778 or at 5664 McCartney Road, Lowellville, OH 44436.

Mailing address

Phone Number

General guidelines on ways to lessen the risk of infection by microbes are available from the EPA Safe Drinking Water Hotline at 1(800) 426-4791.

Please share this information with all the other people who drink this water, especially those who may not have received this notice. You can do this by posting this notice in a public place or distributing copies by hand or mail.

PWS ID # OH5044112

Date Distributed:

PUBLIC NOTICE INSTRUCTIONS AND VERIFICATION FORM FOR TIER 1 VIOLATIONS

The owner or operator of a public water system with a Tier 1 violation or situation that may pose an acute risk to human health is required to notify the persons served by the public water system. Notice shall be issued as soon as practical but **no later than 24 hours** after the system learns of the violation. Public notice shall be repeated as established during consultation with Ohio EPA.

I HEREBY CERTIFY THAT THE PUBLIC WAS NOTIFIED BY THE FOLLOWING METHOD(S) INDICATED BELOW, AS DESCRIBED IN THE OHIO ADMINISTRATIVE CODE RULES 3745-81-32 & 3745-81-43(A)(7):

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"> 1. Public notice issued by appropriate broadcast media (such as radio and television stations) 2. Public notice issued by continuous posting in conspicuous places throughout the area served by the water system (required to remain posted for as long as the violation exists / until corrective action requirements have been satisfied and the system has been Returned to Compliance by Ohio EPA) 3. Public notice issued by hand delivery to persons served by the water system 4. Public notice issued by another delivery method approved in writing 	<p>Describe actual methods used to notify public of the violation:</p> <p>1A. Name of station(s) _____</p> <p>1B. Date provided to station(s) _____</p> <p>2A. Dates of posting _____</p> <p>2B. Locations of posting _____ _____ _____</p> <p>3. Date of delivery _____</p> <p>4A. Method _____</p> <p>4B. Date _____</p>
<p>Additional methods established in consultation with Ohio EPA</p>	<p>A. Method(s) _____ _____</p> <p>B. Date(s) _____</p>

Please indicate below what public notice was used. INCLUDE A COPY OF THE PUBLIC NOTICE.

A public notice as provided was issued without changes.

A different public notice was issued.

Signature of Responsible Person Date

VFW Post #7600 PWS
OH5044112
Mahoning County

Printed Name and Title of Responsible Person

Ground Water Rule TT (Vio. Type 20)

<p>For Ohio EPA use only:</p> <p>Date PN received: _____</p> <p>PN acceptable: _____ PN not acceptable: _____</p>
