



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

February 27, 2013

RE: GEAUGA COUNTY  
 MCDONALDS-BAINBRIDGE  
 NTNC WATER SYSTEM  
 PWS ID. NO. OH2853412  
**LEAD AND COPPER  
 MONITORING AND REPORTING VIOLATION**

Mr. John Benak  
 Margan Management Co.  
 7227 Chagrin Road, Suite B  
 Chagrin Falls, OH 44023

Dear Mr. Benak:

Ohio EPA has received and reviewed your lead and copper monitoring report for the June-September 2012 monitoring period. These results indicate your water system has exceeded the lead action level.

Please be advised of the following requirements for exceeding the lead action level:

**Water Quality Monitoring (Temperature, pH, Calcium, conductivity, Alkalinity) required by 12/31/2012 Due to Exceeding the Lead Action Level:**

One (1) entry point and one (1) distribution sample need to be collected on two different occasions at least one week apart. This is shown on the chart below.

	Required	Sampled Twice	Total Number Samples Required	vs.	Total Number Samples
Collected					
Number of Distribution sites	<u>1</u>	x2	<u>2</u>		<u>0</u>
Number of Entry Point sites	<u>1</u>	x2	<u>2</u>		<u>0</u>

The regulations require that the specified number of sites be sampled twice, which you did not do, therefore, your water system has incurred a monitoring and reporting violation. These water quality parameters must be collected as soon as possible.

If you have questions concerning what these water quality parameters are and how they should be collected, contact me at this office. Issue the enclosed public notice and return a copy of the posted notice and the verification form to this office within 10 days.

**Flushed Entry Point Samples:**

By **March 31, 2013**, you must collect a flushed entry point lead and copper sample from each entry point.

By **March 31, 2013**, you must make a source water treatment recommendation to us based on the sample results of 3a above. You may refer to the enclosed Table 3-5 which will be used to determine whether or not source water treatment will be required.

**Further Tap Monitoring Not Required Now:**

Since an action level has already been exceeded, additional lead and copper tap monitoring is not required at this time.

**Public Education:**

By **November 29, 2012**, you should have delivered the public education materials by the following means:

- a. Post informational notices in public place or common area in each building.
- b. Distribute informational notices to each person served by the system.
- c. Repeat tasks a and b every 12 months as long as you exceed the lead action level.
- d. Submit a letter to us by December 31 of each year reporting on your public education compliance.

Enclosed is information containing the required wording for these public education materials and a verification form. Please complete the verification form and return it to this office with a copy of the informational notice.

The regulations require that public education be issued within 60 days from the end of the monitoring period which you did not do, therefore, your water system has incurred a violation of OAC 3745-81-85 for failure to distribute lead public education information. Issue the attached public notice of the violation in accordance with rule 3745-81-32 of the Ohio Administrative Code. 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.

**Corrosion Control Recommendation:**

After water quality parameters are reviewed, the need for a revised corrosion control recommendation will be determined. If a revised corrosion control recommendation is required, it must be submitted by **March 31, 2013**.

Thank you for your cooperation and if you have any questions, feel free to contact me at (330) 963-1178.

Sincerely,



Deborah Nicholas  
Environmental Specialist  
Division of Drinking and Ground Waters

DN:ds

enclosures: PNs and Verification forms  
Public Education Information  
5108, Table 3-5, Form 141-C

cc: Dan Underwood, Ohio EPA, DDAGW-DW, NEDO; Kim Ethers, Ohio EPA, DDAGW, NEDO

# DRINKING WATER NOTICE

## Failure to Provide Public Education Materials and Conduct Water Quality Parameter Sampling for Lead Exceedances in McDonalds-Bainbridge PWS water

We routinely monitor lead and copper levels in our drinking water. The lead 90<sup>th</sup> percentile level of 17.7 ppb exceeded the action level of 15.0 ppb on 9/19/2012. OAC 3745-81-85 (C)(4) and (C)(5) requires that a non-transient non community water system shall deliver public education materials to consumers within 60 days after the lead action level exceedance and every 12 months thereafter, as long as the system exceeds the lead action level. We failed to deliver the proper lead public education materials to all customers by November 29, 2012, as required.

### What is being done?

- We are still required to post informational posters on lead in drinking water in a public place or common area in each of the buildings served by the system containing the information found in the attached public education.
- We are still required to distribute information pamphlets and/or brochures on lead in drinking water to each person served by the water system.

For more information, please contact \_\_\_\_\_ at \_\_\_\_\_ or \_\_\_\_\_  
mailing address name of contact phone number

*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.*

PWS ID# \_\_\_\_\_ Date distributed: \_\_\_\_\_

Tier 2: Unresolved Lead Public Education public noticing requirement



# DRINKING WATER NOTICE

Monitoring requirements not met for the

## McDonalds-Bainbridge PWS

*We are required to monitor your drinking water for specific contaminants due to exceeding the action level for lead and or copper during the Jun-Sept 2012 monitoring period. Results of this monitoring are an indicator of whether or not your drinking water meets health standards. We "did not monitor or test" or "did not complete all monitoring or testing" for pH, water temperature, alkalinity, calcium, conductivity, orthophosphate (when a phosphate inhibitor is used), and silica (when a silicate-containing inhibitor is used). In addition, we did not monitor with a minimum of one sample for lead and copper at each entry point in the distribution system, and therefore cannot be sure of the quality of your drinking water during that time.*

### What Should I Do?

There is nothing you need to do at this time. You do not need to boil your water or take other corrective action.

### What is being done?

Upon being notified of this violation, the water supply was required to have the drinking water analyzed for the above mentioned parameters. The water supplier will take steps to ensure that adequate monitoring will be performed in the future.

For more information, please contact \_\_\_\_\_ at \_\_\_\_\_  
or \_\_\_\_\_  
phone number mailing address name of contact

*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# OH2853412	Date Distributed:
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Tier 3: WQP PN

## Verification That Public Was Notified For Public Education

### Nontransient Noncommunity and Small Community<sup>1</sup> Public Water Systems

Public Water System Name: \_\_\_\_\_

Public Water System ID Number: \_\_\_\_\_

County: \_\_\_\_\_

Required methods of Public Education for Nontransient Noncommunity and Small Community Public Water Systems	Distribution Date
<p>Post Public Education information on lead in drinking water in a public place or common area in each building served by the public water system.</p> <p><b>And</b></p> <p>Distribute Public Education information on lead in drinking water via pamphlets, brochures or electronic transmission to each person served by the public water system.</p>	<p>Date first posted: _____</p> <p>Date of delivery: _____</p>
<p><b>Additional requirement for Schools and Day-Care Facilities.</b> Parents, legal guardians or persons granted power of attorney shall be directly provided Public Education information on lead in drinking water by methods other than posting, such as newsletter, e-mail notice, or direct mailing.</p>	<p>Method(s) _____</p> <p>_____</p> <p>Date(s) _____</p>

**Please attach a copy of your Public Education material.**

I hereby certify that the Public Education material was distributed to all persons served by the water system. Distribution was made by the methods indicated above in accordance with OAC Rule 3745-81-85.

The attached is representative of what was issued.

\_\_\_\_\_  
Signature of Responsible Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title of Responsible Official

For OEPA use only		
PE received date: _____	PE Acceptable: _____	PE Not Acceptable: _____

<sup>1</sup> Small community systems covered under this verification form include facilities, such as a prison or a hospital, where the population served is not capable of or is prevented from making improvements to plumbing and the system provides water as part of the cost of services and does not separately charge for water consumption.

## PUBLIC NOTICE INSTRUCTIONS AND VERIFICATION FORM FOR NONCOMMUNITY PUBLIC WATER SYSTEMS WITH TIER 2 VIOLATIONS

The owner or operator of a 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><b>Use one or more of the following methods to reach all persons served by the public water system:</b></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)</p> <p>2. Public notice issued by mail or other direct delivery to each customer and service connection (where known).</p>	<p><b>Describe actual methods used to notify public of the violation:</b></p> <p>1A. Dates of posting _____</p> <p>1B. Locations of posting _____ _____</p> <p>2A. Date of mailing/delivery _____</p>
<p><b>If the above methods do not reach all persons served</b>, also use any other method reasonably calculated to reach other persons served by the system (e.g. use of e-mail to notify employees, or delivery of multiple copies to central locations)</p>	<p>A. Method(s) _____ _____</p> <p>B. Date(s) _____</p>

**Please check if the public notice used was provided by Ohio EPA or another acceptable notice was used:**

- \_\_\_\_\_ A public notice as provided 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

**McDonalds-Bainbridge PWS**  
NAME OF PUBLIC WATER SYSTEM

PWSID NUMBER:     OH2853412

COUNTY NAME:     Geauga

**For OEPA use only**

VIOLATION TYPE:   65

Date PN Received: \_\_\_\_\_

MONITORING PERIOD   Jun-Sept 2012

PN acceptable:                      PN not acceptable: