



State of Ohio Environment



Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

January 15, 2010

RE: WAYNE COUNTY
WESTVIEW MOBILE HOME PARK
18592 EDWARDS RD., DOYLESTOWN
COMMUNITY WATER SYSTEM
PWS ID # OH8504412
STU 1 ID # 8559623
STU 2 ID # 8560623

Mrs. Florence Schreibman
P.O. Box 305
Chagrin Falls, OH 44022

CERTIFIED MAIL**Subject: Notice of Violation for Failure to Respond to a Significant Deficiency**

Dear Mrs. Schreibman:

This letter is notification that the Westview Mobile Home Park PWS has not complied with the requirements issued during this Agency's last survey performed on October 21, 2009, in violation of rule 3745-81-60 of the Ohio Administrative Code. Westview Mobile Home Park PWS was notified in correspondence dated November 13, 2009, to respond in writing no later than 45 days, with time frames for the following requirements:

REQUIREMENT(S)

- Operational Monitoring - Operational monitoring is conducted throughout the month to test the treatment effectiveness of the water plant. Since Westview MHP treats its water by chlorination (disinfection), you are required to conduct monitoring for chlorine residual as outlined in OAC 3745-83-01 and stated below:
 - OAC 3745-83-01(G) Operational analyses. The following operational analyses are required for transient non-community (TNC) public water systems that serve at least 1,000 people, all non-transient non-community public water systems, and **all community** public water systems.
 - OAC 3745-83-01(G)(1) **Free chlorine residual**. A public water system that provides water treated with chlorine shall monitor for free chlorine at least **once every day** that water is available to the public **at each entry point to the distribution system and a representative point in the distribution system**. A public water system that uses a surface water source, in whole or in part, shall also conduct disinfection monitoring in accordance with rule 3745-81-74 of the Administrative Code.

- OAC 3745-83-01(G)(2) **Combined chlorine residual.** A public water system that provides water treated with chlorine shall monitor for combined chlorine at least **once every day** that water is available to the public **at each entry point to distribution system and a representative point in the distribution system.** A public water system that uses a surface water source, in whole or in part, shall also conduct disinfection monitoring in accordance with rule 3745-81-74 of the Administrative Code.
- OAC 3745-83-01(I)(1) **Reports.** In addition to any other reporting requirement of Chapter 3745-81 of the Administrative Code, the owner or operator of a public water system required to monitor under paragraphs (G) and (H) of this rule shall prepare an operation report for each month of operation on forms acceptable to the Director. These monthly operating reports (MORs) are available from the Ohio EPA Web site, which can be accessed at <http://www.epa.ohio.gov/ddagw/reporting.aspx#edwr>.

On the MORs, you will need to record the daily production readings and plant and distribution chlorine residuals. The MORs must be submitted to our office by the tenth day following each month. Please begin submitting your MORs starting with the month of December 2009, which will be due to this office by January 10, 2010. If you have any questions about MORs or monitoring, please contact me.

- Consumer Confidence Report - The re-authorized Safe Drinking Water Act of 1996 requires that community water systems issue an annual consumer confidence report (CCR). Your reports for the year 2006, 2007, and 2008 were received and reviewed by our office for the required content. Based on our review, we found that the reports for 2006 and 2007 contained no significant errors. The 2008 report did not include the source water susceptibility language that was included in the 2006 and 2007 reports. Please continue to place this information in your annual consumer confidence reports. Additionally, please note that in all three reports, some data were those from as early as 2004. Please use the most recent data in your consumer confidence reports. Your report for the year 2009 must be delivered to each resident and sent to this office by July 1, 2010. Assistance in preparing the CCR can be obtained by calling our office or accessing the Web site at <http://www.epa.ohio.gov/ddagw/pws.aspx>.
- NSF Chemicals – Your PWS adds chlorine in the treatment of the water. According to OAC 3745-83-01(D),

“All chemicals, substances, and materials added to or brought in contact with water in or intended to be used in a public water system or used for the purpose of treating, conditioning, altering, or modifying the characteristics of such water shall be shown by either

the manufacturer, distributor, or purveyor to be non-toxic and harmless to humans when used in accordance with the formulation and concentration as specified by the manufacturer, and shall conform with the "American National Standards Institute/National Sanitation Foundation" (ANSI/NSF) standard 60 Drinking Water Treatment Chemicals – Health Effects (2005 and previous), or standard 61 Drinking Water System Components - Health Effects (2005 and previous)."

Please ensure the chlorine you are using conform to these standards.

RECOMMENDATION(S)

- Raw Water Tap – We recommend that a sample tap be installed upstream of the pressure tank so that a raw water sample representative of the well can be obtained. If a routine sample result should be reported as total coliform positive, and some or all of the required repeat sample results are also positive, this raw water sample will assist in determining if the bacteria is coming from the well. In addition, the new Groundwater Rule, which will affect most PWSs and will become effective December 1, 2009, will require that when a total coliform positive result is received from the distribution system, a sample must be collected from the well. This sample tap should be located before the pressure tank, at a location that is easily accessible and where the sample bottle can easily be filled up. The tap should be smooth-nosed (not the type used for a hose) and produce a smooth, pencil-thin flow of reasonable velocity.

We have received no reply from the PWS on addressing these requirements. The water system must respond in writing within 15 days from the date of this letter with the required information. Failure to comply may result in further enforcement action.

If you have any questions, please contact me at (330) 963-1194.

Sincerely,



Beth Madis
Environmental Specialist
Division of Drinking and Ground Waters

cc: Ohio EPA, Central Office, DDAGW / OFAS
Wayne County Health Department
Denny White
Forrest May, Westview Mobile Home Park

BM/ams