



State of Ohio Environment



Northeast District Office

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

October 9, 2009

RE: MAHONING COUNTY
HIGHGROVE GOLF COURSE
TRANSIENT, NON-COMMUNITY WATER SYSTEM
PWS ID# OH5044912
STU ID# 5056092

Mr. Joe Serensky
Highgrove Golf Course
2977 Newton Falls Rd.
Diamond, OH 44412

CERTIFIED MAIL

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

Dear Mr. Serensky:

This letter is notification that the Highgrove Golf Course public water system has not complied with requirements issued during this Agency's last survey performed on May 27, 2009, in violation of rule 3745-81-60 of the Ohio Administrative Code. Highgrove Golf Course public water system was notified in correspondence dated June 26, 2009, to respond in writing within 45 days of receipt of your letter, with time frames for the following requirements:

REQUIREMENT(S):

- Well Cap – During the survey, we noted that your well cap is older and in order to keep contaminants from entering your well, you need to ensure your well is kept in good condition. Once the well cap no longer serves to inhibit contaminants from entering your well, please replace it with a new gasketed and vented water tight cap that meets the specifications set forth in OAC 3745-9-05(P). This regulation states:

“A well shall have a well cap or seal to prevent the entrance of water, dirt, animals, insects, or other foreign matter. The top of the casing at its finished height shall be cut so that the surface will fit flush with the well cap and provide a tight seal. The well cap or seal shall fit securely to the top of the well casing, be secured with screws or other appropriate connections, and vent to the atmosphere.”

- Operations – You have a water softener and filter as part of your PWS. During the survey, I noticed that the discharge line from the softener extends into a sewage pipe riser. Both Recommended Standards for Water Works (2003 Edition) Section 4.4.2.9 and Guidelines for Design of Small Public Ground Water Systems (3rd Edition) Section 4.3(B)(4) cite the need for backwash discharge pipes to be installed in such a manner to prevent backsiphonage of brine waste. The discharge cannot extend into the sewer line; an air gap separation is needed. According to Ohio EPA's Backflow Prevention and Cross Connection Control guidance document, the air gap separation distance between the flood rim of the drain and the softener's discharge line should be at least

twice the pipe diameter of the discharge line. This will prevent contaminated water from back-siphoning into the public water system should a vacuum occur.

- Sample Siting Plan - OAC Chapter 3745-81-21(A) requires public water systems to prepare a written coliform bacteria sample siting plan.

A sample siting plan is especially useful when the person who normally samples is unavailable. It includes information on where to collect the samples, how many to collect, and what laboratory is utilized for analysis. It includes an appendix with information on proper sampling techniques and also discusses what actions are required if a sample is found to be total coliform positive.

We do not have a sample siting plan for Highgrove Golf Course, in violation of this rule. Please complete the enclosed sample siting plan and return it to this office. Please maintain a copy on site for subsequent inspections.

- NSF Chemicals – Your PWS uses salt and chlorine in the treatment of your 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 salt and chlorine you are using conforms to these standards.

RECOMMENDATION(S):

The following deficiencies are not regulatory violations, but are actions that are recommended by this Agency for optimum operation and to reduce the potential for future violations or contamination:

- SWAP – The 1996 Amendments to the Safe Drinking Water Act require Ohio EPA to conduct source water assessments for all public water systems. The assessment of your water system will assist you in identifying the potential threats to your water supply, and help you develop protective strategies for your water supply. These reports contain checklists of protective strategies for contaminant sources identified within the report. The reports also identify the susceptibility of your sources to contamination. A

SWAP report was issued to your PWS on July 11, 2005, and identified the susceptibility of your source to contamination as low.

A second copy of this report was given to Ms. Rowbottom during the survey. Please review your report and complete the checklists of protective strategies. Return the checklist to this office within 45 days of this letter date. Specific questions that you may have about the SWAP report can be answered by contacting Conni McCambridge at (330) 963-1200.

- Operations - During the survey, I noticed a cartridge filter located downstream of the carbon filter. Please note that filters such as these may harbor bacteria if not properly maintained. Please check the manufacturer's directions for proper maintenance and cleaning procedures.
- 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.

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 Kathy Metropulos at (330) 963-1149.

Sincerely,



Beth Madis, Environmental Specialist
Division of Drinking and Ground Waters

BM/ams

cc: Ohio EPA, Central Office, DDAGW / OFAS
Mahoning County Health Department
Melissa Rowbottom, Highgrove Golf Course

ec: Kathy Metropulos, Ohio EPA, NEDO, DDAGW