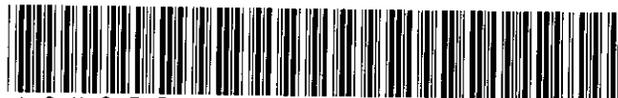




State of Ohio Environment



Northeast District Office

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

December 17, 2009

RE: WAYNE COUNTY
GLENRIDGE MOBILE HOME PARK
10341 E. LINCOLN WAY, ORRVILLE
COMMUNITY WATER SYSTEM
PWS ID # OH8501012
STU ID #8559598

Mr. Tom Funk
Glenridge Mobile Home Park
Touchdown Properties Ltd.
4805 Munson St. NW
Canton, OH 44718

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

Dear Mr. Funk:

This letter is notification that the Glenridge Mobile Home Park PWS has not complied with requirements issued during this Agency's last survey performed on September 4, 2009, in violation of rule 3745-81-60 of the Ohio Administrative Code. Glenridge Mobile Home Park PWS was notified in correspondence dated October 15, 2009, to respond in writing no later than 45 days, with time frames for the following requirements:

REQUIREMENT(S)**Previous Requirements:**

The following required items were noted in the last inspection report dated November 21, 2006 as being deficient. The following is a summary of the requirements and notation as to whether they have or have not been adequately addressed.

Per OAC 3745-81-60(D), a responsible official of the public water system must respond, in writing, within 45 days, indicating how and on what schedule the system will address the following requirement(s).

- During the previous survey we noted that the softeners were no longer in use. Your detail plans (#NE-45543-ws), approved December 20, 1999, included drawings and plans for two softeners. If you are interested in removing this process, you must physically disconnect the unused equipment and provide a sketch describing the change. Please submit this information to our office within 45 days of receipt of this letter.

During this survey, we confirmed that the softeners have been removed. **However, a sketch describing the change has not been submitted. Please submit the sketch describing the change in your treatment as it differs from that accepted by plan approval.**



- The Glenridge system has been classified as a Class A Water Supply System. During the previous survey, we discussed your need to place the responsibility for the technical operation and maintenance of such under the responsible charge of a properly certified operator.

Since that time, Ms. Kick has obtained a Class A Operator's License and is the Operator of Record for this PWS.

- Your PWS may contain yard hydrants that contain weepholes. Yard hydrants with weepholes are prohibited by OAC 3745-95-09 and these types of hydrants must be replaced or the weep holes must be plugged. Any hydrant that would be used throughout the winter will have to be replaced with a non-weephole, freeze-proof design. If you have these types of hydrants, we will require that this be initiated as soon as possible, and be completed within five (5) years. During the previous survey, we asked that you assess whether your PWS has these types of yard hydrants and respond in writing as to if you have them, how you intend to comply with this requirement, and the anticipated schedule for completion.

We have received no further information on whether you have these types of hydrants and your schedule for replacing them, as applicable. **Please respond how you intend to comply with the yard hydrant rules.**

Other Requirements:

Per OAC 3745-81-60(D), a responsible official of the public water system must respond, in writing, within 45 days, indicating how and on what schedule the system will address the following requirement(s).

- Well Cap – During the survey, we noted that your well caps are older and in order to keep contaminants from entering your wells, you need to ensure your wells are kept in good condition. Your north well cap was cracked and your south well did not appear to be properly vented. You will need to replace the caps with new gasketed and vented water tight caps that meet 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.”

For your reference, enclosed is a document showing examples of acceptable well caps.

- Clearwell Overflow Pipe – As stated in your 1999 detail plans (#NE-45543-ws), the clearwell's overflow drain pipe shall be provided with a 24 mesh stainless steel screen. During the survey, the screen was not observed. Please provide the screen for the overflow pipe.
- Operational Monitoring - Operational monitoring is conducted throughout the month to test the treatment effectiveness of the water plant. Since Glenridge MHP treats its water by chlorination (disinfection and oxidation) and iron and manganese removal, you are required to conduct monitoring for chlorine residual and iron and manganese 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 public water systems that serve at least one thousand 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(G)(9)(a) **Iron**. A public water system serving fewer than two hundred and fifty persons that provides treatment to reduce iron shall monitor for iron at least monthly at each entry point into the distribution system using state certified laboratory.
 - OAC 3745-83-01(G)(10)(a) **Manganese**. A public water system serving fewer than two hundred and fifty persons that provides treatment to reduce manganese shall monitor for manganese at least monthly at each entry point into the distribution system using a state certified laboratory.

- **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, plant and distribution chlorine residuals, and monthly iron and manganese results. The MORs must be submitted to our office by the tenth day following each month. If you have any questions about MORs or monitoring, please contact me.

- Secondary Maximum Contaminant Level (MCL) Exceedences - Mr. Jackson has been reliably submitting the MORs each month. However, OAC 3745-82-02 states that the secondary MCL for manganese is 0.05 mg/L. Your MORs show that this MCL has been exceeded during 21 of the past 33 months since the previous survey was conducted. Each month that an MCL was exceeded, a letter was sent notifying you that the equipment may not be operating effectively. You must investigate why you are not getting consistent removal and correct the situation.
- Greensand Filter Backwash Discharge - It was noted during the survey that the discharge line from the iron filters extends into the drainage basin. 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. Please eliminate this potential backflow hazard.
- 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 and 2007 were received and reviewed by our office for the required content. Based on our review of the reports, we found that the 2006 report contained no significant errors.

The 2007 report was delivered to Ohio EPA. One significant error was detected in the report in that it failed to mention monitoring violation that incurred in the subject year. Additionally, a notice of violation was issued to Glenridge MHP on August 29, 2008 for failure to submit the 2007 verification form. This form is important because it conveys to Ohio EPA the date the CCR was delivered to your customers.

You remain in violation of the consumer confidence rules because the 2008 report has yet to be received at Ohio EPA. A notice of violation was issued to Glenridge MHP on August 27, 2009 notifying you that we did not receive the 2008 CCR or verification form, which had been due to be delivered to your customers and to Ohio EPA by June 30, 2009. As we understand from Ms. Kick, a CCR has been prepared and delivered to your customers. Please send your 2008 CCR and verification form to this office so that it may be reviewed.

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 and potassium permanganate for 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 and potassium permanganate you are using conform 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:

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- Chlorine Testing – During the survey, Ms. Kick collected a free chlorine residual with her test kit. We saw that the water vial did not contain a cap and that Ms. Kick was having some troubles using her kit. We recommend that you replace the cap and familiarize yourself with the process of collecting good chlorine residual samples.

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

BRM/ams

cc: Ohio EPA, Central Office, DDAGW / OFAS
Wayne County Health Department
Joyce Kick, Glenridge Mobile Home Park
Rick Jackson