



State of Ohio Environment



Northeast District Office

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

December 18, 2009

RE: WAYNE COUNTY
FOREST VIEW MOBILE HOME PARK
1644 SYLVAN RD., WOOSTER, OH
COMMUNITY WATER SYSTEM
PWS ID # OH8500712
STU ID # 8559595

Mr. Matt Madigan
P.O. Box 548
Smithville, OH 44677

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

Dear Mr. Madigan:

This letter is notification that the Forest View 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. Forest View 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 February 22, 2007 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).

- We recommend community public water systems have at least two wells to serve their water systems. Forest View has a second well that is currently not in operation. During the previous survey, we stated that if the well will no longer be used, it should be properly abandoned and a well sealing report must be issued to the Ohio Department of Natural Resources. A copy of the sealing report must be issued to our office. Please plan to properly abandon this well as soon as possible. Once the well has been abandoned, this will leave Forest View with one well only. Please be aware that continuous water service must be provided at all times regardless of whether a well pump fails. Please contact this office should you wish to site a new well.

Since the previous survey, this has not been addressed. **The second well is still unused and not properly abandoned. Please address the status of this well and take appropriate action.**

- During this survey and the previous survey, we noted that the softener discharge line was not given a proper air gap separation from the sewer drain. The discharge cannot extend into the sewer drain; 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 filter'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.

During this survey we saw that you had taken steps to modify the softener discharge. **However, the discharge still does not contain a proper air gap. Please provide a proper air gap between the softener discharge and the flood rim of the floor drain.**

- 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).

- Chlorination – According to OAC 3745-83-01(C)(1), “all community public water systems shall maintain a minimum chlorine residual of at least two-tenths milligram per liter (mg/L) free chlorine, or one milligram per liter combined chlorine measured at representative points throughout the distribution system.” **In violation of this rule, we tested your chlorine residual and found only 0.08 mg/L, which is inadequate. Please investigate the lack of chlorine residual and correct this situation immediately in order to maintain an adequate free chlorine residual at all times.**
- 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. Once the well caps no longer serve to inhibit contaminants from entering your wells, please replace them with 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.”

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

- Operational Monitoring - Operational monitoring is conducted throughout the month to test the treatment effectiveness of the water plant. Since Forest View MHP treats its water by chlorination (disinfection and oxidation) and softening, you are required to conduct monitoring for chlorine residual and hardness 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)(8)(a) **Hardness**. A public water system serving fewer than two hundred and fifty persons that provides ion exchange treatment or membrane technology to reduce hardness shall monitor for hardness at least monthly at each entry point to 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 hardness. 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 November 2009, which will be due to this office by December 10, 2009. If you have any questions about MORs or monitoring, please contact me.

- Accessibility – PWS operation and maintenance records, including operational data and notations of activities performed by the certified operator or other personnel, must be accessible. According to OAC 3745-07-09(A)(2), "records shall be accessible onsite for twenty-four hour inspection by agency or emergency response personnel." During the survey, we were not able to evaluate your operational records. **You must find a way to make your records available at all times.**
- 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 of the report, we found that the report contained no significant errors. However, please note that some data were those from 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 and uses salt 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 and salt 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:

- 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.
- 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 September 15, 2003, and identified the susceptibility of your source to contamination as moderate.

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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 Kathie Epp at (330) 963-1233.

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
Brad Kurtz