State of Ohio Environmenta

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Ted Strickland, Governor
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February 3, 2009

WAYNE COUNTY
COUNTRY POINTE 1
PWS ID# OH8505112
STU ID# 8559628
COUNTRY POINTE 2
PWS ID# OH8505122
STU ID# 8559629
WOOSTER SUB ACUTE
PWS ID# OH8505012
STU ID# 8559627
COMMUNITY WATER SYSTEMS

Mr. Doug Walters
Griffiths Health Care
3071 N. Elyria Rd.
Wooster, OH 44691

CERTIFIED MAIL

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

Dear Mr. Walters:

This letter is notification that the Griffiths Health Care has not complied with requirements issued during this Agency's last survey performed on October 7, 2008, in violation of rule 3745-81-60 of the Ohio Administrative Code. Griffiths Health Care was notified in correspondence dated October 23, 2008, to respond in writing within 45 days of receipt of your letter, with time frames for the following requirements:

REQUIREMENT(S)

- Chlorine Testing - Operational sampling for chlorine residual in your distribution system is conducted to track the available chlorine that remains for continued disinfection. OAC 3745-83-01(C)(1) states that "...all community public water systems shall maintain a minimum chlorine residual of at least two-tenths milligram per liter free chlorine, or one milligram per liter combined chlorine measured at representative points throughout the distribution system."

  During the survey at **Country Pointe 1**, no chlorine residual was detected, which is a violation of the aforementioned rule. We noticed that the chlorine injectors were in need of cleaning or replacement. Please investigate the lack of chlorine residual and correct this situation immediately.

- During the survey, we observed your wells. The wells at **Country Pointe 1 and Country Pointe 2** have well caps that are tightly secured to the well casing. However, these caps are considered to be temporary well caps. These well caps should be replaced by permanent well caps that meet the following requirements:

- According to OAC 3745-9-05(P), 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."

- According to OAC 3745-9-05(T), "a vent shall be provided on all well caps and seals... A well vent shall be self-draining, screened with a non-corroding mesh screen of fifteen to thirty mesh, pointed downward at or above the top of the casing or pitless unit. A vent shall terminate not less than twelve inches above ground surface, and at least twelve inches above the well house floor or concrete apron surface."

- All three of your PWSs are Class A water systems. In accordance with OAC 3745-7-2(A), a Class A or higher operator must be designated for each Class A PWS. Letters dated April 9, 2008 in the Country Pointe files indicate that our Central Office does not have an operator of record designated for all three of these PWSs. Please contact Dave Evans at (614) 644-3124 to inform him of your operator of record for all three PWSs.

- NSF Chemicals – All three of your PWSs add chlorine to the water and additionally, Wooster Sub Acute uses softener salts. 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 softener salts and chlorine you are using conform with these standards.

- Sample Siting Plan - OAC Chapter 3745-81-21(A) requires public water systems to prepare a written coliform bacteria sample siting plan. **Please complete a plan, or update an existing plan, for each PWS and mail copies of your sample siting plans to this office within 45 days of the date of this letter.** Maintain the plans on site for subsequent inspections.

  Please note that we have received sample siting plans on December 5, 2008 for Country Pointe 1 and Country Pointe 2.

- Contingency Plan - OAC Section 3745-85 requires community water systems to prepare and maintain a written emergency contingency plan. Copies of this plan should be kept in your office and other emergency locations. Contingency plans must be updated annually. Wooster Sub Acute does not yet have a contingency plan. To assist you, a contingency plan template is available on our Web site at the following link:

  http://www.epa.state.oh.us/ddagw/Documents/V2_B_Contingency_Plan_Template.pdf

  Please complete a plan, or update an existing plan, for each PWS and mail copies of your contingency plans to this office within 45 days of the date of this letter. Maintain the plans on site for subsequent inspections.

- Uncovered chlorine day tank – During the survey at **Country Pointe 1**, we noticed that the chlorine day tank was not covered. According to the Recommended Standards for Water Works 2003 Edition ("Ten States Standards") 5.1.10.d, "Chemical solutions shall be kept covered." Covering your tank helps to keep contaminants out as well as allowing the chlorine to be as potent as possible. Please have the cover replaced.

- Further Wooster Sub Acute Requirements - Other requirements for Wooster Sub Acute are addressed in the September 9, 2008 letter I have copied for your reference. During the survey, we reviewed the requirements. Please respond to the items listed in this letter, as well. We already have seen that item 6(C) of the September 2008 letter, addressing the softener discharge, has already been addressed.

We also asked you to consider the following recommendations:

RECOMMENDATION(S)

- Waterlogged Pressure Tank – During the survey at **Country Pointe 1**, we noticed that the well pump was cycling excessively and that the pressure tank, when

knocked on, did not appear to have the hollow sound one would expect to hear if there was enough air in the tank. These two symptoms are associated with a torn bladder causing the tank to become waterlogged. Problems associated with waterlogged tanks include inefficient pump run-times (and pre-mature pump burn-outs) as well as higher incidences of bacterial contamination. Please have this investigated and fixed (or have the pressure tank replaced with a new, similar pressure tank) immediately to operate as it was designed.

- Uncovered pump switch – During the survey at **Country Pointe 1,** we noticed that the pump switch was uncovered. Please replace the cover to this component.

- Old Pressure Tank – During the survey at **Country Pointe 2, we** noticed that the pressure tank is partially buried, highly corroded, and did not have a sight glass. You should replace the sight glass so that you can better gauge how well the pressure tank is operating. In lieu of replacing the sight glass, we recommend replacing the pressure tank with a model that will provide similar volume. Please contact this office to discuss whether detail plans will be required for your replacement.

- 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 **Country Pointe 1** on October 8, 2002 and to **Country Pointe 2** on June 11, 2003. The susceptibility of your sources to contamination was designated as **high**.

  Because of the high susceptibility to contamination, a second copy of the protective strategies checklists was issued to you on March 21, 2006 and we asked that you complete the checklists. To this date, we do not have a completed checklist for either PWS. Please review your report and complete the checklists of protective strategies. Return the checklists to this office within 45 days of this letter date.

  Please contact Conni McCambridge regarding specific questions about these reports. Also, you should contact Conni to conduct an assessment on the **Wooster Sub Acute** PWS. Conni can be reached by calling (330) 963-1200.

- Well Redundancy – Each PWS is operated using only one well. We strongly recommend community public water systems have at least two wells to provide raw water redundancy. 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. Please note that should any significant modifications be made to the PWS, detail plans will need to be submitted and approved prior to construction.

- Raw Water Taps – We recommend that sample taps be installed upstream of the pressure tanks at **Country Pointe 1 and Country Pointe 2** PWSs so that a raw water sample representative of the well can be obtained. (A raw water tap is already available at **Wooster Sub Acute**.) 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 me at (330) 963-1194.

Sincerely,

Beth Madis

Beth Madis
Environmental Specialist
Division of Drinking and Ground Waters

BRM:ams

cc: Ohio EPA, Central Office, DDAGW / OFAS
Wayne County Health Department
Rob Black, Griffiths Health Care
Steve Howe, AKE Laboratory