



State of Ohio Environment

Northeast District



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

May 14, 2008

RE: WAYNE COUNTY
INSPIRATION HILLS
TRANSIENT WATER SYSTEM
PWS ID # OH8539012
STU ID # 8559683

Mr. Bob Patalano, Camp Administrator
Inspiration Hills
4819 W. Easton Rd.
Burbank, OH 44214

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

Dear Mr. Patalano:

This letter is notification that the Inspiration Hills PWS has not complied with requirements issued during this Agency's last survey performed on September 5, 2007, in violation of rule 3745-81-60 of the Ohio Administrative Code. Inspiration Hills was notified in correspondence dated November 23, 2007, to respond in writing no later than 45 days, with time frames for the following requirements:

Previous Requirement:

- Sample Siting Plan – OAC Chapter 3745-81-21(A) requires public water systems to prepare a written coliform bacteria sample siting plan. Inspiration Hills is in violation of this rule because we do not have a sample siting plan on file for the Inspiration Hills. A sample siting plan was requested during the previous survey, as well.

To date, this office does not have a copy of a bacteria sample siting plan for Inspiration Hills, in violation of this rule. Please complete the enclosed sample siting plan template and return a completed copy to this office. Please maintain the plan on site for future inspections.

- Detail Plans – OAC Chapter 3745-91 requires submission and approval of detail plans prior to the construction or installation of a PWS or for any substantial change to the PWS. Detail plans have never been approved for this PWS. During the survey, we noted water treatment equipment that was not present during the last survey conducted in 1995. Because Inspiration Hills is operating with a water treatment plant that has not been approved by this office, you are in violation of OAC Chapter 3745-91. Detail Plans were requested during the previous survey, as well.

Inspiration Hills is in violation of OAC 3745-91-02 for failing to submit an application for plan approval for the installation of the water treatment plant. Please submit detail plans for the water treatment plant at this time. Instructions for plan submittal are enclosed.

- Well Abandonment – Section 3745-9-10 of the OAC requires abandoned wells to be properly sealed. During the survey, we inventoried two wells that are not in service. One well, located near the "Dogwood Cabin" was scheduled for abandonment a few years ago. The second well, located on "the island" near "Dogwood Cabin" had a cracked well cap. If these wells are no longer in use, they must be properly sealed and a well sealing report filed with the Ohio Department of Natural Resources, Division of Water.

Please have the wells sealed and provide this office with a copy of ODNR's well sealing report within 45 days of receipt of this letter.

- Chlorination – For systems that chlorinate, we require that chlorination practices adhere to Ohio Administrative Code requirements and operational practices. Operational sampling for chlorine residual in your distribution system is conducted to track the available chlorine that remains for continued disinfection. We, therefore, require that Inspiration Hills maintain a minimum chlorine residual of at least 0.2 milligram per liter (mg/L) free chlorine measured at representative points throughout the distribution system. By sampling and recording the residual on a daily basis, you can track the operation of your chlorination system.

Please contact your local water quality professional that provides water quality products to obtain a digital chlorine test kit. Begin immediately monitoring and recording your chlorine residuals on a daily basis.

Other Requirement(s):

- Routine Monitoring - It is a requirement to perform routine water sampling as required by the Director. You must be vigilant about conducting your total coliform monitoring in accordance with OAC 3745-81-21 and following your yearly monitoring schedules issued to you at the end of the previous year from our central office. For your convenience, monitoring schedules are available for viewing at our Website listed below.

The following is a summary of violations that have been issued to Inspiration Hills since the time of the previous survey.

Letter Date	Violation	Violation Period	Public Notification (PN) / Verification of PN Date
4/20/05	Routine Total Coliform Monitoring	January through March 2005	None

New Requirement(s):

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 new requirements determined as a result of the sanitary survey:

- Public Notification - Our records indicate that Inspiration Hills failed to post a public notice for the aforementioned monitoring violation. Failing to post a notice is a violation of OAC 3745-81-32, which states "the owner or operator of a public water system which fails to perform the monitoring established by this chapter, or fails to comply with a testing procedure required by this chapter, or is granted a variance or exemption pursuant to this chapter, shall notify persons served by the public water."

In order to correct the violations, you must post a public notice (enclosed) for this violation. The notice must be posted for a minimum of ten days. Within 45 days, please send a

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copy of the notice that you posted, along with the completed verification form (back side of the public notice), to this office.

- Backflow and Cross Connection Control – It was noted during the survey that the discharge line from the softener extends into the floor drain. The discharge cannot extend into the floor drain; an air gap separation is needed. This will prevent contaminated water from back-siphoning into the public water system should a vacuum occur. Additionally, it appeared that a sewer line was directly connected to other lines of your water treatment system. Please eliminate these potential backflow hazards.

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:

- Equipment Maintenance – It was noted during the survey that your softener appeared to have been leaking. Streaks of dried brine were visible on the outside of the softener. Please have your softener cleaned, serviced, and maintained as recommended by the manufacturer.
- 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 March 28, 2005, and identified the susceptibility of your source to contamination as high.

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 Kathy Metropulos at (330) 963-1149.

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

BM/ams