



State of Ohio Environment



Northeast Distr... *OH85591125142008NOV*

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

May 14, 2008

RE: WAYNE COUNTY
ROYAL STAR INN
TRANSIENT WATER SYSTEM
PWS ID #OH8559112
STU ID #8559801

Mr. Nick Patel
Royal Star Inn
11980 E. Lincoln Way
Orrville, OH 44667

CERTIFIED MAIL

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

Dear Mr. Patel:

This letter is notification that the Royal Star Inn PWS has not complied with requirements issued during this Agency's last survey performed on January 31, 2008, in violation of rule 3745-81-60 of the Ohio Administrative Code. Royal Star Inn was notified in correspondence dated March 6, 2008, to respond in writing no later than 45 days, with time frames for the following requirements:

Previous Requirement:

- Water Treatment Plant Operation - During the 2003 survey we noticed a change in operation of your greensand filter. Detail Plans #NE-3643-WS, approved on December 9, 1997, called for batch regeneration of your greensand filter with potassium permanganate. According to Mr. Doug Frontz of Frontz Drilling, Inc., continuous regeneration was introduced around 2002 to help alleviate filtration problems and was found to be much more effective for iron and manganese removal. Ohio Revised Code, Section 6109.07, requires that the Director of Environmental Protection approve plans prior to the modification of a public water system. We asked that you please submit a sketch of the modifications that have been made so that we may determine if formal detail plans will have to be submitted. Please note that a continuously regenerated greensand filter should be designed in accordance with section 4.3 of our design manual entitled, "Guidelines for the Design of Small Public Water Systems."

This office did not receive any response to this deficiency. You must provide the aforementioned information at this time.

New Requirements:

- Chlorination – In addition to the plant operation deficiency explained above, another deficiency was noted during this inspection. Detail Plans #NE-3643-WS,

approved on December 9, 1997, called for chlorination ahead of the clearwell. As we understand, chlorination has been discontinued. In accordance with Ohio Administrative Code 3745-91-02, "No person shall begin construction or installation of a public water system, or make a substantial change in a public water system, until plans therefore have been approved by the director of environmental protection." Further, the plan approval states that "there may be no deviation from the approved plans without the express, written approval of the agency." Chlorination must be re-established in accordance with plan approval. **(Please note that we have been contacted by your WTP operator, McGhee's Technical Water Service, on April 22, 2008, to inform us that the chlorine feed system was set to resume by the end of April 2008. Please verify whether this happened.)**

- Chlorine Testing - 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 Royal Star Inn 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.

Because Royal Star Inn is no longer chlorinating, chlorine testing is not being conducted. Please resume testing once the chlorination is once again in operation.

- Operations - It was noted during the survey that the discharge line from the softener extends into the floor drain line. The floor drain is connected to the sewer lines serving the building, therefore an air gap is required. The air gap will prevent contaminated water from back-siphoning into the water system should a vacuum occur. Please eliminate this potential backflow hazard.

During the previous survey, your discharge lines from the softener and filter had a proper air gap between the discharge lines and the sewer drain. This air gap has been eliminated with the addition of a collar that was installed between the discharge lines and sewer drain. The air gap must be re-installed by removing the collar.

- 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.

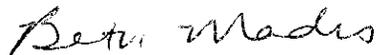
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We have a sample siting plan for the Royal Star Inn dated August 1999. Please review your plan and make modifications as appropriate with regards to your new management and operation personnel. Maintain the plan on site for subsequent inspections and submit a copy of your plan to this office.

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