



State of Ohio Environmental

Northeast District Office



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

May 16, 2008

RE: WAYNE COUNTY
PEACH GROVE MOBILE HOME PARK
2227 BLACHLEYVILLE RD.
WOOSTER, OH
COMMUNITY WATER SYSTEM
PWS ID # OH8502812
STU ID # 8559609

Ms. Marianne Warren
5704 Sunland St. NE
Louisville, OH 44641

CERTIFIED MAIL

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

Dear Ms. Warren:

This letter is notification that the Peach Grove Mobile Home Park PWS has not complied with requirements issued during this Agency's last survey performed on December 20, 2007, in violation of rule 3745-81-60 of the Ohio Administrative Code (OAC). Peach Grove Mobile Home Park was notified in correspondence dated January 17, 2008, to respond in writing no later than 45 days, with time frames for the following requirements:

Previous Requirements:

The following required items were noted in the last inspection report dated November 8, 2004 as being deficient. The following is a summary of the requirements and notation as to whether they have or have not been adequately addressed.

- **Certified Operator** - During the previous survey, we stated that you will need a Class A Operator for your Class A PWS. Your on-site operator at that time, Mr. Jerry Snide, was listed as your Class A Operator. However, as we understand, he no longer is associated with this facility. In accordance with OAC 3745-7-02, you must have a certified operator with a classification greater than or equal to the classification of your PWS. You can contract with a certified operator or become a certified operator to meet this requirement. Please contact 360 Water at (866) 923-3600 to inquire about Class A certification classes. Also, please contact Dave Evans of our Central Office at (614) 644-2752 to discuss your plan for returning to compliance.
- **Well Cap** - During the survey, we noted that your well cap is older and in order to keep contaminants from entering your well, you need to ensure your well is kept in good condition. Your well cap did not appear to be securely fastened or able to be fastened in a manner to inhibit contaminants from entering your well. You will need to replace it with a 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."

- **Monitoring** - 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.

Since the previous survey was conducted, Peach Grove has been issued several monitoring and reporting notices of violation. A summary of the violations is outlined in the following table:

Date	Violation	Violation Period	Public Notification (PN) / Verification of PN Date
3/2/05	Inorganics Monitoring	Jul-Dec 04	none
1/20/05	Total Coliform Monitoring	Dec 04	none
3/16/05	Total Coliform Monitoring	Feb 05	none
9/22/05	Endothall Monitoring	Apr-Jun 05	none
10/20/05	Lead and Copper Monitoring	Jun-Sep 05	none
8/10/06	Repeat Monitoring – Acute MCL	Aug 06	none
11/19/07	Total Coliform Monitoring	Oct 07	11/28/07

* MCL means maximum contaminant level.

The acute MCL of August 2006 resulted in Peach Grove being subject to a water use advisory. The water use advisory was lifted when four total coliform negative repeat sample were collected on August 18, 2006. Although required, we have no record that public notices were issued for most of these violations.

- **Public Notification** - Our records indicate that Peach Grove MHP failed to post a public notice for the aforementioned violations. 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 public notices for these violations. The notice must be posted for a minimum of ten days. Within 45 days, please send a copy of the notices that you posted, along with the completed verification forms (back side of or stapled to the public notice), to this office.

- **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. Please continue to update your plan annually. Please maintain the plan on site for subsequent inspections.

- Operational Monitoring – After January 1, 2008, the Ohio EPA will be requesting that all community water systems begin to electronically submit Monthly Operating Reports (MORs) to the Ohio EPA. You will be notified in advance by mail regarding this requirement. The application will be “Web based” and instructions and training will be provided by Ohio EPA.

In the interim, we are asking that public water systems get into the routine of submitting MORs to this office. We are asking that you begin to submit the form 5002 (“distribution”) MOR to this office. I have included some “blank” MORs and instructions for your convenience. Please make copies of the form as necessary.

Record the daily production readings, and plant and distribution chlorine residuals on the form in accordance with the instructions. The form must be submitted to the letterhead address by the tenth day following each month. For example, the February form must be submitted by March 10. If you have any questions about the MOR please contact me.

- Chlorine Test Kit – During the survey, we noticed that you have an older style analog DPD chlorine test kit. **Please note that you will need to obtain a digital chlorine meter to measure the chlorine residual. The meter must have a method detection limit of 0.1 mg/L.** While the Acolor wheel® kit you have can be used for daily chlorine tests to evaluate the operation of the chlorination system, **total chlorine tests conducted during the monthly total coliform sampling must be conducted using a digital chlorine detection kit.** Compliance with these parameters will be based upon a running annual average, calculated quarterly. Please obtain a proper chlorine test kit and begin using it immediately.
- Yard Hydrants - According to OAC Chapter 3745-99-01, the installation of yard hydrants where water is available or accessible for drinking or culinary purposes and having drip openings below ground surface is prohibited unless such hydrants are equipped with approved devices to prevent entrance of ground water into chambers connected with the water supply.

Please check to see if you have yard hydrants with the drip openings. If you have these type of hydrants, they must be replaced or the weep holes must be plugged. Any hydrant that would be used throughout the winter would have to be replaced with non-weep hole, freeze-proof design. We will require that this be initiated as soon as possible, and be completed within five (5) years.

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:

- 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 **high**.

A second copy of this report was sent to you on December 4, 2004. 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.

- Well Redundancy – The Peach Grove system 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.
- Operations - During the survey, I noticed two cartridge filters located downstream of the pressure tank. These filters serve only the water line to the home where the water treatment system is located. Please note that filters such as these may harbor bacteria if not properly maintained. Please check the manufacturer=s directions for proper maintenance and cleaning procedures.
- 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.

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