



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 11, 2013

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

Ms. Shannon Kahler, Camp Administrator
Inspiration Hills
4819 W. Easton Rd.
Burbank, OH 44214

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

Dear Ms. Kahler:

This letter is notification that the Inspiration Hills public water system has not complied with requirements issued during this Agency's last survey performed on November 28, 2012, in violation of rule 3745-81-60 of the Ohio Administrative Code (OAC). Inspiration Hills public water system was notified in correspondence dated December 20, 2012, to respond in writing within 30 days of receipt of your letter, with time frames for the following requirements:

REQUIREMENT(S):

- 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 previous surveys conducted in 1999, 2003, 2007, we noted water treatment equipment that was not present during the 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 required during the previous surveys, as well.

Inspiration Hills remains in violation of OAC 3745-91-02 for failing to submit an application for plan approval for the installation of the water treatment plant.

A drawing was given to me during the 2010 LSSV. However, we still need detail plans to be submitted. I have enclosed a copy of the drawing for your reference. **Please submit detail plans for the water treatment plant by February 28, 2013.** Instructions for plan submittal are enclosed.

- Well Abandonment – Section 3745-9-10 of the OAC requires abandoned wells to be properly sealed. During the previous 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 more centrally near Maple Conference Center (MCC), has 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 (ODNR). We required you to have the wells sealed and provide this office with a copy of ODNR's well sealing report within 45 days of receipt of the 2007 survey letter.

After evaluating the wells by a professional well driller, you determined the well located near MCC was no longer needed and would be properly abandoned. A copy of the ODNR well sealing report was received in this office on December 8, 2010.

The second well, located near Dogwood Cabin, is still in place. You had determined that it may be valuable to use it in the future for non-potable purposes, or if PWS requirements are met, for potable purposes. **While it appears that a crack in the well cap has been caulked, this is not an acceptable fix to the well cap. Please have the cap replaced and a sign affixed to the top, identifying it as a non-potable well. This well must remain completely separate from the PWS.**

- Chlorination – During the previous survey, we discussed monitoring your chlorine residuals. 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.

In 2007, you did not have chlorine test kit. We suggested you contact your local water quality professional that provides water quality products to obtain a digital chlorine test kit. We required that you begin immediately monitoring and recording your chlorine residuals on a daily basis.

During the 2010 LSSV, a request was made for a variance to this requirement. At that time, the regulations did not require a transient PWS such as yours to conduct the daily chlorine residual monitoring, and therefore we agreed that two days per week would suffice. **However, OAC 3745-81-03(F), revised April 2012, requires chlorine monitoring as follows:**

OAC 3745-83-01(F)(2)(a) Chlorine residual. “A public water system that provides water treated with chlorine shall monitor for free or combined 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 or points in the distribution system.”

As we understand, a proper DPD Test Kit has not been obtained. **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.** Please obtain a proper chlorine test kit and begin using it immediately.

- 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.

During the previous survey, we brought to your attention a missing public notice for a violation for failing to sample during the January through March 2005 monitoring period. You were able to determine that an incorrect PWS ID number was entered on your laboratory paperwork causing you to not receive credit for the January through March 2005 sample. A sample was in fact collected on March 24, 2005.

The following is a summary of violations that have been issued to Inspiration Hills in the past three years.

Letter Date	Violation	Violation Period	Public Notification (PN) / Verification of PN Date
6/22/10	Monthly MCL	Apr-Jun 2010	7/1/10
7/28/10	Major Repeat Monitoring	July 2010	None
7/28/10	Major E. Coli	July 2010	None
8/5/10	Monthly MCL	July 2010	None
8/26/10	Minor Routine Monitoring	July 2010	None

- Public Notification - Our records indicate that Inspiration Hills failed to post a public notice for most of 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 (enclosed) for these violations. The notices must be posted for a minimum of ten days. Within 30 days, please send a copy of the notices that you posted, along with the completed verification form for each notice (back side of the public notice or separate page), to this office.

- Backflow and Cross Connection Control – It was noted during the previous survey that the discharge line from the softener extends into the waste water line. The discharge cannot extend into the waste water line; 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 softener’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.

Additionally, it appeared that other cross connections are present in the treatment train. Please eliminate all potential backflow hazards.

During the 2010 LSSV, we discussed the problem further because the potential backflow problems were still present. **During this survey, we observed the same potential backflow and cross-connection issues and these must be evaluated and corrected.**

- Monthly Operating Reports – According to OAC 3745-83-01(H), and 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 ... shall prepare and submit an operation report (monthly operation report, or MOR) for each month of operation on forms acceptable to the director. The operation report shall be signed by the operator of record or by an individual who has been delegated by the operator of record and submitted to the director no later than the tenth of the month following the month for which the report was prepared. Instructions on how to submit MORs through the electronic drinking water reports system (eDWR) can be accessed at <http://www.epa.ohio.gov/ddagw/reporting.aspx#edwr>. For assistance in setting up an eDWR account, you can contact Brian Tarver, eDWR Administrator, at brian.tarver@epa.state.oh.us or (614) 728-1740.

Please begin submitting your MORs (showing your chlorine residuals) starting with the month of January 2012, which will be due to this office by February 10, 2012. If you have any questions about MORs or monitoring, please contact me.

- NSF Chemicals – Your PWS adds chlorine to 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 you are using conforms 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:

- Source Water Assessment and Protection (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.

A second copy of your report has been enclosed for your reference. Please review your report and complete the checklists of protective strategies. Return the checklist to this office within 30 days of this letter date. Specific questions that you may have about the SWAP report can be answered by contacting Atiur Rahman at (330) 963-1200.

- Rope In Well – During the survey, we noticed a rope extending from inside the casing to the outside. We do not know the purpose for this rope, although we have seen ropes being used to help support of the well pump. A properly constructed well with a secure drop-pipe and torque arresters should be adequate support for the well pump. If the rope breaks, it could entangle in the well pump. We recommend that the rope be removed; however, you should ensure that your well pump has adequate support. You may wish to consult with a well driller regarding the use of supplemental support of the well pump.

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- Pump House Door – During the survey, we saw the pump house down by the well had a broken door lock. The door was being held shut by a heavy metal plate. Please have the lock replaced immediately.
- Treatment Train Labeling – During the survey, we reviewed the treatment train in your water treatment room. It was very difficult to follow. We strongly recommend labeling all lines and equipment with words and water directional arrows so that it is clear to all visitors, operators, maintenance workers, etc. who view your water treatment room.
- Access Road – Access to the well is strictly via a narrow trail that passes through swamp land, accessible only by specialized truck or ATVs. We strongly recommend a road access from SR 604 to access the well. As we understand, a road from SR 604 could serve well to access this section of your camp for potable water system needs, but also for emergency vehicles.

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