





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

Re: Pleasant Acres MHC
Community PWS
PWS ID OH5100612

NOTICE OF VIOLATION

August 1, 2013

Mr. Joseph Badalamenti
44140 Riverview Ridge
Clinton Township, Michigan 48038

Dear Mr. Badalamenti:

A sanitary survey in January 2012, limited scope site visits (LSSVs) in October 2012 and June 2013, and subsequent review of the operation records collected, monthly operating reports (both original and resubmitted), and facility bench sheets submitted to Ohio EPA indicate Pleasant Acres Mobile Home Community is in violation of Ohio Administrative Code (OAC) Rules. Note: some of these violations have been previously cited.

A review of your records indicates the following:

1. In accordance with OAC Rule 3745-7-09(A)(3)(b), operation records shall at a minimum contain the dates and times of arrival and departure for the operator of record (ORC) and any other operator required by this chapter. A review of the operation records indicates the ORCs consistently failed to indicate the time of arrival or departure.
2. In accordance with OAC Rule 3745-7-03(C), Pleasant Acres is a Class A facility and is required to have an operator of record physically present at the facility two days per week for a minimum of 1 hour per week. A review of the operations records indicates the minimum staffing requirements were not met.
3. In accordance with OAC Rule 3745-83-01(H)(1)(c), the monthly operating reports (MORs) shall include information on daily water treatment and system pumpage. A review of the MORs from 2011 and 2012 indicates production values were not initially reported on many of the MORs. Some months' production values were added when the MORs were resubmitted in 2013, however, some months' production values were not reported.
4. In accordance with OAC Rule 3745-83-01(H)(1)(b), MORs shall include a summary of samples analyzed, including distribution system sampling and chlorine residual sampling. The March 2011 MOR failed to report free and combined chlorine residuals for the distribution system. Additionally, both the original and resubmitted February 2012 MORs failed to report free and combined chlorine residual at the plant tap.

5. Ohio EPA's review of the data from the bench sheets submitted for August, September, and December 2011 and June, September, October, November, and December 2012, in comparison with the original and resubmitted MORs, revealed numerous inconsistencies between the free chlorine data reported on the bench sheets and the free chlorine data reported on the MORs. There were also numerous instances of incorrectly calculated combined chlorine residuals.
6. In accordance with OAC Rule 3745-83-01(F)(9)(a), a community public water system serving up to and including two hundred fifty persons that provides ion exchange treatment to reduce hardness shall monitor for total hardness at least monthly. Ohio EPA's review of information submitted indicates failure to **monitor** for **hardness** during at least the months of:
 - 2010: August, November
 - 2011: February, March, April, May, June, July, August, September, October
 - 2012: May, June, August, September, October, November, December
 - 2013: January
7. In accordance with OAC Rule 3745-83-01(H)(1), MORs shall include analyses of general parameters relating to the quality of the treated drinking water. Ohio EPA's review of the originally submitted MORs and the MORs resubmitted in 2013 in response to the February 21, 2013 Notice of Violation (NOV) indicates:

Originally submitted MORs:

- Failure to **report hardness** during at least the months of:
2012: January, February, March, April, July
- Failure to **accurately report hardness** during at least the months of:
2011: November, December
- Failure to **accurately report iron** during at least the months of:
2011: May, June, September

MORs resubmitted in 2013

- Failure to **report hardness** during at least the months of:
2012: April
- Failure to **accurately report hardness** during at least the months of:
2012: November, December
- Failure to **accurately report iron** during at least the months of:
2011: September
2012: April, May, June, August, September, November, December

8. In accordance with OAC Rule 3745-7-09(B)(1), certified operators shall perform their duties in a responsible and professional manner consistent with standard operating procedures and best management practices. The laboratory sample submission forms which should have been marked for hardness analysis for at least the months of April, May, June, August, and September 2011 were marked by the operator for analysis of iron rather than hardness.

9. In accordance with the following rules, Pleasant Acres Mobile Home Community failed to monitor or report during these time periods:
 - OAC Rule 3745-81-23 for nitrate
January 1 – December 31 2011
 - OAC Rule 3745-31-21 for total coliform
July 2012
 - OAC Rule 3745-96-01 through 04 - Consumer Confidence Report 2012
 - OAC Rule 3745-81-85 - lead consumer notice for June 1-September 30, 2012
 - OAC Rule 81-81(E)(1)(a) and OAC Rule 3745-81-90(C)(2) - treatment technique requirement for lead and copper corrosion control. Plans were required by March 31, 2013.
10. In accordance with Ohio Revised Code (ORC) 6109.31(B), no person shall make a false material statement or representation in an application, license, record, report, or other document that is required to be submitted to the director or to the attorney general under this chapter, a rule adopted under it, or any order or term or condition of a license, license renewal, variance, or exemption granted by the director under it. A review of the December 2011 MOR indicates that chlorine residual values were provided for a date where no data was recorded on the bench sheet.
11. In accordance with OAC Rule 3745-09-05, a well shall have a well cap or seal to prevent the entrance of water, dirt, animals, insects, or other foreign matter. During the January 23, 2012, sanitary survey, the well cap was not sealed as required. On March 16, 2012, Ohio EPA received the following response from your certified operator, Shawn Daley: "The Cap on the interior well has been fixed per OAC Rule 3745-09-05(P)." Ohio EPA's site visit on June 7, 2013 verified the repair.
12. In accordance with OAC 3745-09-05(O)(2), the finished grading around a well shall be sloped for surface water runoff away from the well. During the January 23, 2012 sanitary survey, the ground was not sloped away from the well. On March 16, 2012, Ohio EPA received the following response from Mr. Daley: "Park Maintenance has graded a slope into the ground surrounding the outside well to provide proper runoff." Ohio EPA's site visit on June 7, 2013 verified the finished grading.
13. In accordance with OAC Rule 3745-95-05(A)(1), an approved air gap separation shall be installed where a public water system may be contaminated with substances that could cause a severe health hazard. During the January 23, 2012 sanitary survey, the backwash line from the softener equipment was not isolated from the wastewater plumbing. On March 16, 2012, Ohio EPA received the following response from Mr. Daley, "Park personel [sic] fixed the air gap on the filter backwash line per your requirement." Ohio EPA's site visit on June 7, 2013 verified the air gap separation.
14. In accordance with OAC Rule 3745-85-01, community water systems are required to prepare and maintain a written contingency plan for providing safe drinking water to its service area under emergency conditions and update the contingency plan as necessary, but at least annually. During the January 23, 2012 sanitary survey, the contingency plan on file had not been updated within the past year.

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On March 16, 2012, Ohio EPA received the following response from Mr. Daley: "The contingency plan is currently in review and a copy sent to your office as soon as possible." The contingency plan was not forwarded to Ohio EPA and the copy available during the June 7, 2013 site visit included a slip of paper on the front cover which stated "2012," however, the information contained in the contingency plan had not been updated for 2012 or 2013.

15. In accordance with OAC Rule 3745-7-09, the records required to be maintained at the public water system did not include identification of the public water system. On March 16, 2012, Ohio EPA received the following response from Mr. Daley: "PWS ID# has now been written on the facility log book." Ohio EPA's site visit on June 7, 2013 verified the records contained the identification of the public water system.
16. In accordance with OAC Rule 3745-7-03(D)(2) daily visits shall be performed by the owner, supplier, or their representative or agent seven days per week and noted in the operational and maintenance records. The review of the operations records indicated daily visits were not being performed seven days per week.

Please provide a written response **within 15 days** of the date of this letter indicating the steps you will take to ensure compliance or continued compliance with the requirements above.

If you have any questions or comments, please feel free to contact me at 419-373-3046.

Sincerely



Ellen J. Gerber
Manager
Division of Drinking and Ground Waters

/cg

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