



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



NOTICE OF VIOLATION – ACTION REQUIRED

Re: Erie County
City of Vermilion
Community Water System
PWS ID# OH2201511
STU ID# 2253917

August 21, 2013

Mr. Robert Kurtz, Service Director
City of Vermilion
5511 Liberty Avenue
Vermilion, Ohio 44089

Dear Mr. Kurtz:

On August 5, 2013, the Division of Drinking and Ground Waters, Northwest District Office, received your response letter, dated July 23, 2013, to the June 25, 2013 sanitary survey letter sent by Ohio EPA. In accordance with Ohio Administrative Code Rule 3745-81-60(D), a public water system must respond within thirty days indicating how and on what schedule the system will address requirements contained in the sanitary survey letter. The response letter was not received within thirty days and therefore, the City is in violation of this rule.

In addition, I have reviewed the letter and I have the following:

Requirements

1. The response which states, "All Class III ORCs have been instructed to make sure they properly sign in and out of the log book daily" satisfactorily addresses the requirement to ensure the dates and times of arrival and departure for the operator of record and any other required operator are recorded. However, in accordance with OAC Rule 3745-7-03(C)(2)(d), ensure a Class II operator is not routinely being used to circumvent the minimum staffing requirement of Class III operators.

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2. Provide photographic evidence of the four installed low service pumps and documented verification of the capacity for each pump at the beach well.
3. Provide written documentation of the testing and passing of the water treatment plant backflow devices, as well as written documentation for the one back flow device that is to be repaired and tested.
4. Provide the time frame for getting a proposal from the City Engineer and the City Engineer's plan for the removal of the tube settlers as soon as it becomes available. Ohio EPA should be notified at least a week in advance prior to work commencing.
5. Provide a copy to this office of the updated contingency plan as stated in your response.

Recommendations

Regularly update Ohio EPA on the City's progress on:

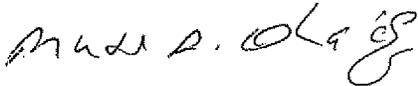
1. Implementation and documentation of your valve exercising program.
2. Assessment of the structural conditions of the flocculation/sedimentation basins, filter gallery, clearwells, and the area of the high service pumps.
3. Training of plant personnel in regard to filter coring, sieve analysis and media acidification on each filter. In addition, provide updates on the implementation of these activities.
4. Investigation of the design standard discrepancies between the 1991 plan approval and the 2009 Water Plant Assessment.
5. Installation of panic hardware on the door in the chlorine room.
6. Inspection of the intake structure.
7. Assessment of unaccounted water loss and actions implemented to reduce loss.
8. Implementation of an improved written flushing program procedure.
9. Investigation outcome regarding the proper PAC feed system and engineer plans, as required.
10. Establishment of a regular maintenance program to properly flush the permanganate feed system.

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11. Progress regarding the current implementation of your written maintenance program for the clearwell, pumps, chemical feed equipment, valves, and other critical components.
12. Progress towards developing a master plan for water system capital improvements.

If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me at (419) 373-3103.

Sincerely,



Musa A. Khaleq, P.E.
Environmental Engineer 2
Division of Drinking and Ground Waters

/cg

pc: Eileen Bulan, Mayor
Laura Webb, DDAGW, CO
Erie County Health Department
Ellen Gerber, Manager, DDAGW, NWDO
Paul G. Brock, P.E., Engineering Supervisor, DDAGW, NWDO
Jim Warner, Operator of Record
Donald Daley, Operator of Record
Scott Smith, Operator of Record
Wesley Brewer, Operator of Record
NWDO-DDAGW file

