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NON-TRANSIENT, MAJOR NON-COMMUNITY PUBLIC WATER SUPPLY
PWS I.D. #3136512

06/22/94

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LETTER

OhioEPA
State of Ohio Environmental Protection Agency

Southwest District Office
40 South Main Street
Dayton, Ohio 45402-2086
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George V. Voinovich
Governor

June 22, 1994

Re: DOE-FEMP
Hamilton County
Non-Transient, Major Non-Community
Public Water Supply
PWS I.D. #3136512

Mr. Phil Hamric, Manager
Department Of Energy, Fernald
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Hamric:

Section 6109.04 of the Ohio Revised Code requires the Ohio Environmental Protection Agency to perform evaluation surveys of public drinking water supply systems. On May 26, 1994, I met with Leroy Pennington, Ed Skintic, and Frank Johnston to survey the Department Of Energy, Fernald Environmental Management Project drinking water supply facilities and discuss system operation.

The following comments pertain to the survey:

1. A review of our records indicates that bacteriological analyses of samples from the drinking water system are being performed and reported as required. The records indicate that the water produced by the system complies with the Ohio EPA drinking water quality standards for bacteriological contaminants. If you have any questions regarding compliance with the monitoring requirements for bacteriological analyses, please contact Ms. Lyn Rupp of this office at (513) 285-6357.

2. The facility appears to be in compliance with the contaminant monitoring requirements at this time. In order to remain in compliance with the Ohio EPA drinking water contaminant monitoring requirements, it will be necessary to follow the sample collection and analysis schedule, dated November 23, 1992, that was sent to you from our Columbus office. The results indicate that the water produced by the system complies with the drinking water quality standards for the parameters examined. If you have any questions regarding compliance with the monitoring requirements for these analyses, please contact the Water Quality Section in our Columbus office at (614) 644-2752.

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3. We are aware that numerous samples have been collected directly from the drinking water supply wells and analyzed for uranium and other site specific parameters. However, these results have not been submitted to our office. The Ohio EPA requires the owners and operators of public water systems to report all analytical results from drinking water wells and systems to the district office, even if the monitoring is not required by the Ohio EPA. It will be necessary to submit at this time all results from the additional analyses which have not been previously reported to this office. It will also be necessary to ensure that all results from the drinking water wells and system are promptly submitted in the future.

4. As you know, public water systems are now required to monitor for lead and copper at consumers' taps. A review of the results indicated that the lead and copper levels in the drinking water are within acceptable limits.

5. A review of the monthly operating reports (yellow and green forms) indicates that the reports are being completed properly.

6. I was pleased to note that the wells meet all of the requirements to be classified as "groundwater" sources.

7. The Ohio EPA has been in the process of classifying public drinking water systems. As part of this survey, the facilities of the DOE-FEMP drinking water system have been evaluated and determined to be a Class II water treatment plant and Class I distribution system. DOE will be receiving a classification certificate and certified operator requirements from our Columbus Office in the near future.

8. It has been reported that the drinking water system at the facility will be connected to Cincinnati's new Water West system. The date that the water systems will be connected is estimated to be July of 1995. It will be necessary to inform this office in writing when the connection to the Water West system is complete and the raw water line from the existing supply wells is physically disconnected. When we are notified in writing that this work has been completed, the facility will become just another customer of the Cincinnati water system and the water system at the site will no longer be under the jurisdiction of the Ohio EPA. At that point, it will no longer be necessary to perform analyses of samples from the drinking water system or report to the Ohio EPA Drinking Water Unit.

9. It was reported during the survey that the existing water supply wells will be properly abandoned after the connection to the Cincinnati system is completed. However, before abandoning the wells, it will be necessary to contact Tom Schneider of the Office of Federal Facilities Oversight in this office, and the USEPA Region V representative, to determine if the wells will be required to be retained for monitoring purposes.

10. It was noted that the overflow discharge pipe on the 750,000 gallon ground storage tank is connected directly to a storm sewer. It was also noted that the potable water elevated tank does not have an overflow pipe that extends down to ground level. Section 7.0.6 of the Recommended Standards For Water Works states in part:

> All water storage structures shall be provided with an overflow which is brought down to an elevation between 12 and 24 inches above the ground surface, and discharge over a drainage inlet structure or a splash plate. No overflow may be connected directly to a sewer or a storm drain. All overflow pipes shall be located so that any discharge is visible.

Part b. of this section also states:

> The overflow of a ground-level structure shall open downward and be screened with twenty-four mesh noncorrodible screen installed within the pipe at a location least susceptible to damage by vandalism.

It was reported that these tanks will remain in operation after the water system begins purchasing water from the Cincinnati system. In order to conform to the Recommended Standards, it will be necessary to sever the connection between the overflow pipe and the storm sewer on the 750,000 gallon ground tank, and have the overflow on the potable water elevated tank brought down to ground level. The overflows should discharge above a storm sewer or a splash plate as stated in the recommended standards.

11. The backflow prevention program was discussed with Jeff Hensley during a telephone conversation on June 3, 1994. Mr. Hensley reported that 23 backflow prevention devices are in use throughout the distribution system, in addition to the air-gap separation between the potable and the process water systems. He also reported that the devices are visually inspected once per week and tested once per year by one of four on site workers certified in backflow prevention. These measures meet or exceed the Ohio EPA requirements for backflow prevention.

12. Overall, the operations and maintenance practices at the water treatment plant appear to be very good. The plant and related equipment appeared to be clean and orderly, and in good working order.

I appreciated everyone's cooperation while conducting this survey. If you believe any misunderstandings have occurred regarding any of the items listed, please bring them to my attention.

Please respond in writing by August 31, 1994, to let us know what action is planned to ensure that all results from the drinking water wells and system will be reported to this office, and to report what action will be taken regarding the storage tank overflows. If you have any questions, feel free to call Jeff Stark or me at (513) 285-6357.

Sincerely,

Rex Brown
Division of Drinking and Ground Waters
Public Drinking Water Unit

cc: Leroy Pennington, Manager of Utilities
Jeff Hensley, Superintendent of Water Supply
Ed Skintic, Environmental Engineer
Frank Johnston, Senior Technical Program Specialist
Hamilton County Health Commissioner
Raymond Shesky, Engineering & Operations, DDAGW, CO