

OHIO E.P.A.

SEP 28 2005

ENTERED DIRECTOR'S JOURNAL

Effective Date SEP 28 2005

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:
Village of Rock Creek :
3081 West Water Street :
Rock Creek, OH 44084 :

DIRECTOR'S FINAL
FINDINGS AND ORDERS

Respondent,

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to the Village of Rock Creek (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) Chapter 6109 and § 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent's public water system shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 6109 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent owns and operates a "public water system" (PWS), which is also a "community water system" as defined by ORC § 6109.01.
2. Respondent's PWS (PWS ID# 0401111) is located at 3081 West Water Street, Rock Creek, Ashtabula County, Ohio 44084.

to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.
By: [Signature] Date 9-28-05

3. Respondent's PWS obtains its drinking water from a "surface water" source as defined by OAC Rule 3745-81-01 and serves a population of 550 persons.
4. In accordance with OAC Rule 3745-89-05(A)(9), a certified laboratory shall maintain an acceptable quality assurance plan for drinking water analyses.
5. In accordance with OAC Rule 3745-89-08(F), failure by a certified laboratory to file complete, correct, and timely reports of analytical results required by this rule may be considered by the Director as failure to meet an acceptable level of performance.
6. In violation of OAC Rules 3745-89-05(A)(9) and 3745-89-08(F), from October 1, 2004 through December 4, 2004, Respondent failed to maintain an acceptable quality assurance plan and file correct reports of required analytical results; all analytical results reported during this time period are unacceptable to the Director.
7. In accordance with OAC Rule 3745-81-28, analytical results for the purpose of determining compliance may be considered only if they have been determined and reported by a laboratory certified by or otherwise acceptable to the Director under OAC Chapter 3745-89.
8. In accordance with OAC Rule 3745-89-02(A), analysis for the purpose of determining compliance with OAC Chapters 3745-81 and 3745-82 and OAC Rules 3745-91-06 and 3745-9-09, or for other analyses required by the Director, are to be performed in a laboratory located in the state of Ohio and holding a valid and unexpired laboratory certification, and by an individual conducting analyses as designated on the laboratory certificate of approval.
9. In violation of OAC Rules 3745-81-28 and 3745-89-02(A), Respondent's laboratory certifications expired on December 4, 2004 and Respondent continued to operate the laboratory through January 31, 2005. All laboratory analyses conducted and analytical results reported from December 5, 2004 to January 31, 2005 when Respondent's laboratory certifications were expired are unacceptable to the Director (On April 5, 2005, Ohio EPA provided Respondent with laboratory certifications that will expire on April 4, 2006).
10. In accordance with OAC Rule 3745-81-73(B)(1), all PWSs that use slow sand filtration shall meet the following requirement: turbidity level of representative samples of filtered water shall be less than or equal to one nephelometric turbidity units (NTU) in at least ninety-five per cent of the samples each month.
11. In violation of OAC Rule 3745-81-73(B)(1), Respondent failed to submit acceptable data for providing sufficient filtration of its drinking water when the turbidity levels of representative samples of the filtered water were not less than or equal to one NTU

in at least ninety-five per cent of the samples during the months of January 2004, February 2004, March 2004, April 2004, May 2004, October 2004, November 2004, December 2004, and January 2005.

12. In accordance with OAC Rule 3745-81-72(B)(1), version effective January 1, 2002 through December 31, 2004, PWSs that use a surface water source, in whole or in part, shall provide sufficient disinfection treatment as follows: the total treatment processes of the PWS reliably achieve at least 99.9 per cent (3 log) inactivation and/or removal of *Giardia lamblia* cysts and at least a 99.99 per cent (4 log) inactivation and/or removal of viruses, as determined in the appendix of this rule.
13. In violation of OAC Rule 3745-81-72(B)(1), version effective January 1, 2002 through December 31, 2004, Respondent failed to submit acceptable data for providing sufficient disinfection treatment of drinking water when the actual CT (residual disinfection concentration x contact time) value during the maximum hourly flow rate did not meet or exceed the required minimum CT value set forth in the appendix of this rule during the months of October 2004, November 2004, and December 2004.
14. In accordance with OAC Rule 3745-81-72(B)(1), version effective January 1, 2005 through present, PWSs that use a surface water source, in whole or in part, shall provide sufficient disinfection treatment as follows: the total treatment processes of the PWS consistently and reliably achieve at least 99.9 per cent (3 log) inactivation and/or removal of *Giardia lamblia* cysts and at least a 99.99 per cent (4 log) inactivation and/or removal of viruses, as determined from the tables A and B of this rule. The inactivation by disinfection is calculated from the actual CT divided by the required CT during the peak hourly flow of each day that the PWS is in operation.
15. In violation of OAC Rule 3745-81-72(B)(1), version effective January 1, 2005 through present, Respondent failed to submit acceptable data for providing sufficient disinfection treatment of drinking water when the actual CT (residual disinfection concentration x contact time) value during the maximum hourly flow rate did not meet or exceed the required minimum CT value set forth in the tables of this rule during the month of January 2005.
16. In accordance with OAC Rule 3745-81-74(E), version effective January 1, 2002 through December 31, 2004, parameters necessary to determine the sufficiency of disinfection prior to the first customer as required in OAC Rule 3745-81-72 shall be measured and recorded at the peak hourly flow rate each day the PWS is in operation. PWSs which do not record any or all of the parameters in paragraphs (E)(1) to (E)(3) of this rule on continuously recording devices may estimate the period at which peak hourly flow will occur from records of flow rates from previous days for that water plant. The parameters necessary to calculate the actual CT value may then be those measured during this estimated peak hourly flow period.

17. In violation of OAC Rule 3745-81-74(E), version effective January 1, 2002 through December 31, 2004, Respondent failed to submit acceptable data for monitoring the parameters (temperature and pH) necessary to determine CT at the peak hourly flow rate during the months of October 2004, November 2004, and December 2004.
18. In accordance with OAC Rule 3745-81-74(F), parameters necessary to determine the sufficiency of disinfection prior to the first customer as required in OAC Rule 3745-81-72 shall be measured and recorded at the peak hourly flow rate each day the PWS is in operation. PWSs which do not record any or all of the parameters set forth in paragraphs (F)(1) to (F)(3) of this rule on continuously recording devices, may estimate the period at which peak hourly flow will occur from records of flow rates from previous days for that water plant. The parameters necessary to calculate the actual CT value may then be those measured during this estimated peak hourly flow period.
19. In violation of OAC Rule 3745-81-74(F), Respondent failed to submit acceptable data for monitoring the parameters (temperature and pH) necessary to determine CT at the peak hourly flow rate during the month of January 2005.
20. In accordance with OAC Rule 3745-81-74(A), turbidity measurements as required by OAC Rule 3745-81-73 shall be performed on representative samples of filtered water at least every four hours that the water treatment plant is in operation.
21. In violation of OAC Rule 3745-81-74(A), Respondent failed to submit acceptable data for monitoring the filtered water turbidity at least every four hours when the plant was in operation during the months of October 2004, November 2004, December 2004, and January 2005.
22. In accordance with OAC Rule 3745-81-75(A)(1), the total number of filtered water turbidity determinations during the month, as required by OAC Rule 3745-81-74 (A), shall be reported to the Director within ten days after the end of each month the PWS serves water to the public.
23. In violation of OAC Rule 3745-81-75(A)(1), Respondent failed to submit acceptable data for reporting to the Director the total number of filtered water turbidity determinations within ten days after the end of the month during the months of October 2004, November 2004, December 2004, and January 2005.
24. In accordance with OAC Rule 3745-81-75(A)(2), version effective January 1, 2002 through December 31, 2004, the number and per cent of filtered water turbidity determinations during the month which are less than or equal to the turbidity limits specified in OAC Rule 3745-81-73(A)(1), (A)(2) or (B)(1) for the filtration method being used shall be reported to the Director within ten days after the end of each month the PWS serves water to the public.

25. In violation of OAC Rule 3745-81-75(A)(2), version effective January 1, 2002 through December 31, 2004, Respondent failed to submit acceptable data for reporting to the Director the number and per cent of filtered water turbidity determinations within ten days after the end of the month during the months of October 2004, November 2004, and December 2004.
26. In accordance with OAC Rule 3745-81-75(A)(2), version effective January 1, 2005 through present, the number and per cent of filtered water turbidity determinations during the month which are less than or equal to the turbidity limits specified in OAC Rule 3745-81-73(A)(1) or (B)(1) for the filtration method being used shall be reported to the Director within ten days after the end of each month the PWS serves water to the public.
27. In violation of OAC Rule 3745-81-75(A)(2), version effective January 1, 2005 through present, Respondent failed to submit acceptable data for reporting to the Director the number and per cent of filtered water turbidity determinations within ten days after the end of the month during the month of January 2005.
28. In accordance with OAC Rule 3745-81-75(C)(2), disinfection information specified in OAC Rule 3745-81-74, including the date and duration of each period when the residual disinfectant concentration in water entering the distribution system fell below 0.2 milligrams per liter free chlorine or one milligram per liter combined chlorine, shall be reported to the Director within ten days after the end of each month the PWS serves water to the public.
29. In violation of OAC Rule 3745-81-75(C)(2), Respondent failed to submit acceptable data for reporting to the Director the date and duration of each period when the disinfectant concentration entering the distribution system fell below 0.2 milligram per liter free chlorine or one milligram per liter total chlorine within ten days after the end of the month during the months of October 2004, November 2004, December 2004, and January 2005.
30. In accordance with OAC Rule 3745-81-75(C)(3)(b), disinfection information specified in OAC Rule 3745-81-74, including the number of samples with residual disinfectant concentration determined to be less than 0.2 milligram per liter free chlorine or one milligram per liter combined chlorine taken in the distribution system, shall be reported to the Director within ten days after the end of each month the PWS serves water to the public.
31. In violation of OAC Rule 3745-81-75(C)(3)(b), Respondent failed to submit acceptable data for reporting to the Director the number of samples with residual disinfectant concentration determined to be less than 0.2 milligram per liter free

chlorine or one milligram per liter combined chlorine within ten days after the end of the month during the months of October 2004, November 2004, December 2004, and January 2005.

32. In accordance with OAC Rule 3745-81-75(C)(3)(c), disinfection information specified in OAC Rule 3745-81-74, including the per cent of samples with residual disinfectant concentration of at least 0.2 milligram per liter free chlorine or one milligram per liter combined chlorine taken in the distribution system, shall be reported to the Director within ten days after the end of each month the PWS serves water to the public.
33. In violation of OAC Rule 3745-81-75(C)(3)(c), Respondent failed to submit acceptable data for reporting to the Director the per cent of samples with residual disinfectant concentration of at least 0.2 milligram per liter free chlorine or one milligram per liter combined chlorine within ten days after the end of the month during the months of October 2004, November 2004, December 2004, and January 2005.
34. In accordance with OAC Rule 3745-81-75(F), if at any time the residual disinfectant concentration falls below 0.2 milligram per liter free chlorine or one milligram per liter combined chlorine in the water entering the distribution system, the PWS shall notify the Director as soon as possible, but no later than by the end of the next business day. The PWS also shall notify the Director by the end of the next business day whether or not the residual disinfectant concentration was restored to at least 0.2 milligram per liter free chlorine or one milligram per liter combined chlorine within four hours.
35. In violation of OAC Rule 3745-81-75(F), Respondent failed to submit acceptable data for reporting to the Director by the end of the next business day that the residual disinfectant concentration of water entering the distribution system was less than 0.2 milligram per liter free chlorine or one milligram per liter combined chlorine from October 1, 2004 through January 31, 2005.
36. In accordance with OAC Rule 3745-83-01(B)(2), each community PWS shall maintain a minimum chlorine residual of at least two-tenths milligram per liter free chlorine, or one milligram per liter combined chlorine measured at representative points throughout the distribution system.
37. In violation of OAC Rule 3745-83-01(B)(2), Respondent failed to maintain a chlorine residual of at least two-tenths milligram per liter free chlorine or one milligram per liter combined chlorine at representative points throughout the distribution system on April 11, 2002, May 15, 2002 and January 16, 2005.

38. In accordance with OAC Rule 3745-83-01(E)(1)(a), version effective April 21, 2001 through August 3, 2004, the operator of a community PWS shall prepare an operation report for each month of operation on forms provided by the Director, and submit the report to the district office with jurisdiction no later than the tenth of the month following the month for which the report was prepared.
39. In violation of OAC Rule 3745-83-01(E)(1)(a), version effective April 21, 2001 through August 3, 2004, Respondent's operator failed to submit monthly operating reports for the months of March 2002 and April 2002.
40. In accordance with OAC Rule 3745-83-01(F)(1), the operator of a community PWS shall prepare an operation report for each month of operation on forms provided by the Director, and submit the report to the district office with jurisdiction no later than the tenth of the month following the month for which the report was prepared.
41. In violation of OAC Rule 3745-83-01(F)(1), Respondent's operator failed to submit the monthly operating report for the month of January 2005 by February 10, 2005; the monthly report was submitted untimely on March 31, 2005.
42. On December 17, 1999, the Director issued a chemical contaminant monitoring schedule to Respondent (2000 monitoring schedule) for the compliance period that began on January 1, 2000 and ended on December 31, 2000.
43. On December 15, 2000, the Director issued a chemical contaminant monitoring schedule to Respondent (2001 monitoring schedule) for the compliance period that began on January 1, 2001 and ended on December 31, 2001.
44. In accordance with OAC Rule 3745-81-23(B)(2) and Respondent's 2001 monitoring schedule, PWSs which are a surface water system are required to monitor monthly to determine compliance with the maximum contaminant level (MCL) for nitrate in OAC Rule 3745-81-11.
45. In violation of OAC Rule 3745-81-23(B)(2) and Respondent's 2001 monitoring schedule, Respondent failed to monitor to determine compliance with the MCL for nitrate during the month of May 2001. Respondent monitored untimely for nitrate on June 19, 2001.
46. In accordance with OAC Rule 3745-81-24(C) and Respondent's 2000 monitoring schedule, Respondent was required to monitor for synthetic organic chemicals (SOCs) during the May through July 2000 monitoring period.
47. In violation of OAC Rule 3745-81-24(C) and Respondent's 2000 monitoring schedule, Respondent failed to monitor for SOC's during the May through July 2000 monitoring period. Respondent monitored untimely for SOC's on June 28, 2001.

48. In accordance with OAC Rule 3745-81-24(B) and Respondent's 2000 monitoring schedule, Respondent was required to monitor for volatile organic chemicals (VOCs) during the January through March 2000 monitoring period.
49. In violation of OAC Rule 3745-81-24(B) and Respondent's 2000 monitoring schedule, Respondent failed to monitor for VOCs during the January through March 2000 monitoring period. Respondent monitored untimely for VOCs on June 28, 2001.
50. In accordance with OAC Rule 3745-81-24(C) and Respondent's 2001 monitoring schedule, Respondent was required to monitor for SOCs during the May through July 2001 monitoring period.
51. In violation of OAC Rule 3745-81-24(C) and Respondent's 2001 monitoring schedule, Respondent failed to monitor for all the required SOCs during the May through July 2001 monitoring period. Respondent monitored untimely for SOCs on August 8, 2001.
52. In accordance with OAC Rule 3745-81-12(B), a surface water system serving fewer than ten thousand persons is in compliance with the MCL for total trihalomethanes (TTHMs) if the running annual average is not greater than 0.080 mg/L.
53. In accordance with OAC Rule 3745-81-24(C)(9)(a), for PWSs monitoring for TTHMs at a frequency greater than annually, compliance is determined by a running annual average of all samples taken at each sampling point. If the running annual average of quarterly averages covering any consecutive four quarter period of any sampling point is greater than the MCL, then the PWS is out of compliance.
54. In violation of OAC Rule 3745-81-12(B) and OAC Rule 3745-81-24(C)(9)(a), Respondent exceeded the MCL for TTHMs in the July through September 2004, October through December 2004, January through March 2005, and April through June 2005 quarters. The running annual average is 133 ug/l.
55. In accordance with OAC Rule 3745-81-24(D)(4), community PWSs that treat their water with any combination of chlorine, chloramines, chlorine dioxide and/or ozone, shall monitor for TTHMs and haloacetic acids five (HAA5) according to this rule.
56. In violation of OAC Rule 3745-81-24(D)(4), Respondent failed to monitor for HAA5 during the January through March 2004 monitoring period.
57. In accordance with OAC Rule 3745-81-32, the owner or operator of a PWS shall provide public notification for violations.

58. In violation of OAC Rule 3745-81-32, Respondent failed to issue public notification for failing to monitor for all the required SOCs during the May through July 2001 monitoring period.
59. Each of the violations cited above represents a separate violation of ORC § 6109.31.

V. ORDERS

1. Within thirty (30) days of the date of noncompliance with any treatment technique requirements of OAC Rules 3745-81-72 and 3745-81-73, Respondent shall make interim improvements to the water treatment plant. Such improvements may consist of, but are not limited to, optimization of the existing chemical feed, installation of alternative chemical feed equipment for the addition of polymers/ chemicals to improve turbidity removal, and/ or rebuilding the filters. Detail plans shall be approved by the Director prior to any major *substantial change* in Respondent's PWS.
2. On or before October 31, 2006, Respondent shall accomplish the water line connection with the Ashtabula County Department of Environmental Services and commence with operations of such.
3. From the effective date of these Orders until completion of Order No. 2, Respondent shall perform monthly sampling for TTHM in accordance with the sampling monitoring plan at EP001 and at MR002. If Respondent's TTHM levels remain elevated, the Director may require Respondent to operate via a temporary water line connection to the Village of Roaming Shores.
4. On or before December 31, 2006, Respondent shall properly decommission its current water treatment plant.
5. Within ten (10) days after the deadlines provided in Order Nos. 2 and 4, Respondent shall send written notification of compliance with the requirements of each of the Orders to Ohio EPA, NEDO, DDAGW.
6. Respondent shall comply with its chemical contaminant monitoring schedule for the calendar year 2005 and all subsequent monitoring schedules issued by Ohio EPA.
7. Within thirty (30) days of the effective date of these Orders, Respondent shall notify the public, in accordance with OAC Rule 3745-81-32, for the violations identified in Finding No. 58. Respondent shall provide Ohio EPA with copies of all public notices and verification forms.

8. Respondent shall pay the amount of forty thousand eight hundred dollars (\$40,800.00) in settlement of Ohio EPA's claim for civil penalties, which may be assessed pursuant to ORC Chapter 6109. On or before June 1, 2006 and December 1, 2006, payment to Ohio EPA shall be made by an official check(s) made payable to "Treasurer, State of Ohio" for ten thousand two hundred dollars (\$10,200.00) of the total amount. Payment shall be made in two equal installment checks of five thousand one hundred dollars (\$5,100.00) each. The official checks shall be submitted to Brenda Case, or her successor, together with a letter identifying Respondent, to:

Ohio EPA
Office of Fiscal Administration
P. O. Box 1049
Columbus, Ohio 43216-1049

9. In lieu of paying eight thousand one hundred and sixty (\$8,160.00) dollars of civil penalty, Respondent shall within thirty (30) days of the effective date of these Orders, fund a Supplemental Environmental Project (SEP) by making a contribution in the amount of \$8,160.00 to the Ohio EPA's Clean Diesel School Bus Fund (Fund 5CD). Respondent shall tender an official check made payable to "Treasurer, State of Ohio" for eight thousand one hundred and sixty dollars. The official check shall be submitted to Brenda Case, or her successor, together with a letter identifying the Respondent, to:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, Ohio 43216-1049

A copy of each check shall be sent to James A. Orlemann, Assistant Chief, SIP Development and Enforcement, or his successor, at the following address:

Ohio EPA
Division of Air Pollution Control
P.O. Box 1049
Columbus, OH 43216 - 1049

10. Should Respondent fail to fund the SEP within the required timeframe set forth in Order No. 9, Respondent shall pay to Ohio EPA \$8,160.00 of the civil penalty in accordance with the procedures in Order No. 8.
11. In lieu of paying the remaining twenty two thousand four hundred and forty (\$22,440.00) dollars of the total civil penalty, Respondent shall complete the SEP of removing and replacing three hundred and three (303) water meters located

within Respondent's service area within one year of the effective date of these Orders.

12. Within ten (10) days after the deadline provided in Order No. 11, Respondent shall send written notification of completion of the SEP to Ohio EPA, NEDO, DDAGW.
13. Should Respondent fail to complete the SEP within the required timeframe in Order No. 11, Respondent shall within thirty (30) days of the SEP deadline pay to Ohio EPA \$22,440.00 of the civil penalty in accordance with the procedures in Order No. 8.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's DDAGW acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete." This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(D)(4) for a municipal facility.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to the operation of Respondent's PWS.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders (with the exception of the penalty payment referenced in Order No. 8) shall be addressed to:

Ohio Environmental Protection Agency
Northeast District Office
Division of Drinking and Ground Waters
2110 East Aurora Road
Twinsburg, Ohio 44087-1969
Attn: Enforcement Coordinator

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in

these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity. Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency

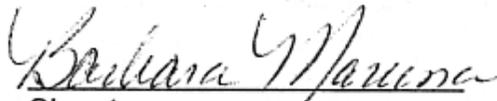


Joseph P. Koncelik, Director

SEP 28 2005
Date

IT IS SO AGREED:

Village of Rock Creek



Signature

9-10-05
Date

BARBARA MARUNA Mayor
Printed or Typed Name and Title