



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

December 22, 2006

RE: Clark County
Woodrow Corporation
Nontransient Noncommunity
Water System
PWSID#: 1243612

Mr. John Woodrow and Patrick McAtee
Woodrow Corporation
4300 River Road
Springfield, Ohio 45501

Hand Delivery

Dear Mr. Woodrow and McAtee:

The public water system (PWS) at Woodrow Corporation (Woodrow) has violated Ohio's safe drinking water law. Specifically, Woodrow is in violation of the new maximum contaminant level (MCL) for arsenic, which became effective on January 1, 2006. In accordance with Ohio Administrative Code (OAC) Rule 3745-81-11(B), the running annual average (RAA) MCL for arsenic is 10 µg/L. Woodrow violated OAC Rule 3745-81-11(B) in the July through September 2006 and during the October through December 2006 monitoring periods. Currently, the RAA for arsenic is 28 ug/L. Please refer to the results in the table. Below is an agreed upon schedule for Woodrow's PWS to meet the requirements of the arsenic MCL.

Sample Date	Sample Results (ug/L)
	EP001
3/28/06	17
6/29/06	31
8/10/06	41
11/01/06	23

Owners or operators of public water systems that fail to comply with Ohio's safe drinking water laws and regulations are subject to civil penalties of up to \$25,000 per day per violation under Ohio Revised Code Section 6109.33.

To resolve of your drinking water violations and to prevent possible legal action and civil penalties:

- 1) Monitor for arsenic with one sample per calendar quarter in accordance with Ohio Administrative Code (OAC) Rule 3745-81-23(E)(2)(a).
- 2) Comply with the monitoring and reporting requirements in accordance with the 2007 chemical monitoring schedule.

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncelik, Director

- 3) By December 31, 2006 submit approvable revised detail plans to address arsenic in the drinking water.
- 4) Within thirty (30) days of notification, address any comments or deficiencies noted by Ohio EPA on any plan or other documentation submitted by Woodrow.
- 5) Woodrow will continue to provide bottled water for drinking purposes, including food preparation, until the installation of arsenic removal treatment is complete.
- 6) By February 28, 2007, complete construction to initiate operation in accordance with Director's plan approval.
- 7) No later than twelve (12) months after completion of construction/installation of arsenic removal treatment, Woodrow will be in compliance with the running annual average MCL for arsenic in accordance with OAC Rule 3745-81-11(B).
- 8) Post public notice in accordance with OAC Rule 3745-81-32 for violations of the arsenic MCL. Send the public notice and verification form to Ohio EPA, Central Office, DDAGW, Attn: Kathy Pinto, 122 South Front Street, Columbus, Ohio 43215.
- 9) No later than June 30, 2007 place Woodrow's PWS under the responsible charge of a certified operator having a valid Class I certification or higher as required by OAC Rule 3745-7-02.

Sincerely,



Michael G. Baker, Chief
Division of Drinking and Ground Waters

If it is your intent to comply with the safe drinking water laws and regulations in the manner specified, please sign this document and return it to the attention of Emily Cushman at Ohio EPA, DDAGW, Lazarus Government Center, P.O. Box 1049, Columbus, Ohio 43216-1049, within fourteen (14) days. Your signature is not considered an admission of guilt, only an indication of your intention to address the violations noted. Ohio EPA reserves its right to seek civil penalties pursuant to Revised Code 6109.33 for the violations described in this letter. If you have any questions concerning this letter, please call Emily Cushman at (614) 644-2752.



Mr. Patrick McAtee
Woodrow Corporation

12/22/2006
Date