
Public Water System

Consumer Confidence Report

2022



**Ohio Environmental Protection Agency
Division of Drinking and Ground Waters**

www.epa.ohio.gov/ddagw

City of St. Clairsville
Drinking Water Consumer Confidence Report
For 2022

The City of St. Clairsville has prepared the following report to provide information to you, the consumer, on the quality of our drinking water. Included within this report is general health information, water quality test results, how to participate in decisions concerning your drinking water and water system contacts.

In 2022, we treated 193,170,000 gallons of water.

What's the Source of Your Drinking Water:

The City of St. Clairsville receives its drinking water from the Main Reservoir located on Reservoir Road and Provident Reservoir located on Vineyard Hills Road.

For the purposes of source water assessments, all surface waters are considered to be susceptible to contamination. By their nature surface waters are accessible and can be readily contaminated by chemicals and pathogens with relatively short travel times from source to the intake. Based on the information compiled for this assessment, the City of St. Clairsville drinking water source protection area is susceptible to agricultural runoff, failing septic systems, and contamination through motor vehicle accidents or spills at sites where roads pass near the reservoirs.

It is important to note that this assessment is based on available data, and therefore may not reflect current conditions in all cases. Water quality, land uses and other activities that are potential sources of contamination may change with time. While the source water for the City of St. Clairsville is considered susceptible to contamination, historically, the St. Clairsville Public Water System(PWS) has effectively treated this source water to meet drinking water quality standards.

Copies of the public water source Consumer Confidence report for the City of St. Clairsville are available by contacting (740) 695-1410.

The City of St. Clairsville also has a back-up connection with the Belmont County Water and Sewer District. During 2022 we did not utilize this connection. This report does not contain information on the water quality received from the Belmont County Water and Sewer District but a copy of their Consumer Confidence Report can be obtained by contacting their water office at (740) 695-3144.

What are sources of contamination to drinking water?

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally-occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in source water include: (A) Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock operations and wildlife; (B) Inorganic contaminants, such as salts and metals, which can be naturally-occurring or result from urban storm water runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming; (C) Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban storm water runoff, and residential uses; (D) Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban storm water runoff, and septic systems; (E) Radioactive contaminants, which can be naturally-occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, USEPA prescribes regulations which limit the amount of certain contaminants in water provided by public water systems. FDA regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the Federal Environmental Protection Agency's Safe Drinking Water Hotline (1-800-426-4791).

Who needs to take special precautions?

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons, such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infection. These people should seek advice about drinking water from their health care providers. EPA/CDC guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* and other microbial contaminants are available from the Safe Drinking Water Hotline (1-800-426-4791).

About your drinking water:

The EPA requires regular sampling to ensure drinking water safety. The City of St. Clairsville conducted sampling for bacterial, inorganic, synthetic organic, and volatile organic contaminants during 2022. Samples were collected for a total of 60 different contaminants, most of which were not detected in the City of St. Clairsville's water supply. The Ohio EPA requires us to monitor for some contaminants less than once per year because the concentrations of these contaminants do not change frequently.

Table of Detected Contaminants

How to read the Water Quality Data Table: EPA establishes the safe drinking water regulations that limit the amount of contaminants allowed in drinking water. The table shows the concentrations of detected substances in comparison to regulatory limits. Substances that were tested for, but not detected, are not included in this table.

Listed below is information on those contaminants that were found in the City of St. Clairsville's drinking water.

TABLE OF DETECTED CONTAMINANTS

Contaminants (Units)	MCLG	MCL	Level Found	Range of Detections	Violation	Sample Year	Typical Source of Contaminants
Microbiological Contaminants							
Turbidity (NTU)	N/A	TT	0.29	0.03-0.29	No	2022	Soil runoff
Turbidity (% samples meeting standard)	N/A	TT	99%	N/A	No	2022	Soil runoff
Radioactive Contaminants							
Alpha (pCi/L)	0	15	1.41	N/A	No	2021	Erosion of natural deposits
Inorganic Contaminants							
Fluoride (ppm)	4	4	0.7	0.714-0.714	No	2022	Erosion from natural deposits; water additive which promotes strong teeth
Nitrate (ppm)	10	10	1.00	0.0-1.06	No	2022	Runoff from fertilizer usage
Barium (ppm)	2	2	0.023	N/A	No	2022	Discharge of drilling wastes; erosion of natural deposits
Antimony (ppb)	6	6	2.85	N/A	No	2021	Discharge from petroleum refineries; fire retardants; ceramics; electronics; solder
Arsenic (ppb)	0	10	3.99	N/A	No	2021	Erosion of natural deposits; Runoff from orchards; Runoff from glass and electronics production wastes
Cadmium (ppb)	5	5	1.41	N/A	No	2021	Corrosion of galvanized pipes; erosion of natural deposits; discharge from metal refineries; runoff from waste batteries & paints
Chromium (ppb)	100	100	9.08	N/A	No	2021	Discharge from steel and pulp mills; Erosion of natural deposits

Selenium (ppb)	50	50	3.20	N/A	No	2021	Discharge from petroleum and metal refineries; erosion of natural deposits; discharge from mines
Disinfection Byproducts							
Total Trihalomethanes (TTHM) (ppb)	N/A	80	60.0	25.2-114.0	No	2022	By-product of drinking water chlorination
Haloacetic Acid (HAA5) (ppb)	N/A	60	45.0	17.1-66.5	No	2022	By-product of drinking water chlorination
Residual Disinfectants							
Total Chlorine (ppm)	4	4	1.50	1.3-1.5	No	2022	Water additive used to control microbes
Lead and Copper							
Contaminants (units)	Action Level (AL)	Individual Results over the AL	90% of test levels were less than	Violation	Year Sampled	Typical source of Contaminants	
Lead (ppb)	15 ppb	N/A	0	No	2021	Corrosion of household plumbing systems; erosion of natural deposits	
	0 out of 20 samples were found to have lead levels in excess of the lead action level of 15 ppb.						
Copper (ppm)	1.3 ppm	N/A	0.115	No	2021	Corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservatives	
	0 out of 20 samples were found to have copper levels in excess of the copper action level of 1.3 ppm.						

Unregulated contaminants are those for which EPA has not established drinking water standards. The purpose of unregulated contaminant monitoring is to assist EPA in determining the occurrence of unregulated contaminants in drinking water and whether future regulation is warranted. In 2021 the City of St. Clairsville participated in the fourth round of the Unregulated Contaminant Monitoring Rule (UCMR 4). For a copy of the results, please call the St. Clairsville Water Treatment Plant at 740-695-1161.

TABLE OF DETECTED UNREGULATED CONTAMINANTS

Contaminants (Units)	MCLG	MCL	Level Found	Range of Detections	Violation	Sample Year	Typical Source of Contaminants
Chloroform (ppb)	N/A	N/A	5.74	N/A	No	2021	By-product of drinking water chlorination
Bromodichloromethane (ppb)	N/A	N/A	2.11	N/A	No	2021	By-product of drinking water chlorination
Dibromochloromethane (ppb)	N/A	N/A	2.03	N/A	No	2021	By-product of drinking water chlorination

Nickel (ppb)	N/A	N/A	2.72	N/A	No	2021	Erosion of natural deposits
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Total Organic Carbon (TOC)					
MCL (Units)	Level Found	Range of Monthly Ratios	Violation	Year Sampled	Typical Source of Contaminants
TT (ppm)	0.60	0.07-1.94	No	2022	Naturally present in the environment

Turbidity

Turbidity is a measure of the cloudiness of water and is an indication of the effectiveness of our filtration system. The turbidity limit set by the EPA is 0.3 NTU in 95% of the samples analyzed each month and shall not exceed 1 NTU at any time. As reported above, the City of St. Clairsville's highest recorded turbidity result for 2022 was 0.29 NTU and lowest monthly percentage of samples meeting the turbidity limits was 99%.

Violations

On November 22, 2021 the City of St. Clairsville PWS received notice of failure to monitor for drinking water disinfection byproducts, TTHM's and HAA5's, during the third quarter, July, August, and September, of 2021. This violation was resolved by collecting the required samples and notifying the public through the CCR. See attached notice of violation at end of report. Steps taken to prevent this from happening again is to post the monitoring schedule in more places and have everyone pay attention to it. We received a NOV on not having the paperwork for public notice filled out correctly. It is attached with this CCR along with the original violation.

On 5/23/2022 we received a NOV for only having one operational high service pump. EPA requires us to always have two pumps in operation. We contacted Total Equipment Company to install a new motor drive to operate the other high service pump. This was completed in July of 2022. See attached violation at end of this report.

On 2/7/23 we received a NOV for not sampling for Total Organic Carbon (TOC) in raw and finished water for the month of December 2022. Steps taken to fix this were to place more reminders of testing in several places. The public notification along with the NOV is attached to the end of this report.

On 3/1/23 we received a partial resolution of violation and schedule acceptance for connection to the Belmont County PWS for our water supply. We continue to get this because of Belmont County is not ready to supply The City of St. Clairsville with water full time. See attached NOV at the end of this report.

Lead Educational Information

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. The City of St. Clairsville is responsible for providing high quality drinking water but cannot control the variety of materials used in plumbing components. When water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline at 800-426-4791 or at <http://www.epa.gov/safewater/lead>.

Revised Total Coliform Rule (RTCR) Information

All water systems were required to begin compliance with a new rule, the Revised Total Coliform Rule, on April 1, 2016. The new rule maintains the purpose to protect public health by ensuring the integrity of the drinking water distribution system and monitoring for the presence of total coliform bacteria, which includes E. coli bacteria. The U.S. EPA anticipates greater public health protection under the new rule, as it requires water systems that are vulnerable to microbial contamination to identify and fix problems. As a result, under the new rule there is no longer a maximum contaminant level violation for multiple total coliform detections. Instead, the new rule requires water systems that exceed a specified frequency of total coliform occurrences to conduct an assessment to determine if any significant deficiencies exist. If found, these must be corrected by the PWS.

License to Operate (LTO) Status Information

In 2022 we had a conditional license to operate our public water system. The conditions require us to address ongoing violations. For more information on these violations, contact Jeff Mottle, Operator of Responsible Charge (ORC) at 740-695-1161.

Public Participation and Contact Information

How do I participate in decisions concerning my drinking water?

The City Council meets twice a month to receive Committee reports and vote on any pending legislation. Members of the public may address City Council by making arrangements at least one business day in advance of the Council Meeting with the Council President Jim Velas, who can be reached by calling (740) 695-1324 or by sending an email to jvelas@stclairsville.com.

Or

While we do not hold regular meetings, customers are encouraged to contact Jeff Mottle, ORC at 740-695-1161 or Jeremy Greenwood's office at (740) 695-0156.

Definitions of some terms contained within this report:

- **Maximum Contaminant Level Goal (MCLG):** The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.
- **Maximum Contaminant level (MCL):** The highest level of contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.
- **Maximum Residual Disinfectant Level (MRDL):** The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.
- **Maximum Residual Disinfectant Level Goal (MRDLG):** The level of drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.
- **Action Level (AL):** The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.
- **Treatment Technique (TT):** A required process intended to reduce the level of a contaminant in drinking water.
- **Contact Time (CT)** means the mathematical product of a "residual disinfectant concentration" (C), which is determined before or at the first customer, and the corresponding "disinfectant contact time" (T).
- **Microcystins:** Liver toxins produced by a number of cyanobacteria. Total microcystins are the sum of all the variants/congeners (forms) of the cyanotoxin microcystin.
- **Cyanobacteria:** Photosynthesizing bacteria, also called blue-green algae, which naturally occur in marine and freshwater ecosystems, and may produce cyanotoxins, which at sufficiently high concentrations can pose a risk to public health.
- **Cyanotoxin:** Toxin produced by cyanobacteria. These toxins include liver toxins, nerve toxins, and skin toxins. Also sometimes referred to as "algal toxin".
- **Level 1 Assessment** is a study of the water system to identify the potential problems and determine (if possible) why total coliform bacteria have been found in our water system.
- **Level 2 Assessment** is a very detailed study of the water system to identify potential problems and determine (if possible) why an E. coli MCL violation has occurred and/or why total coliform bacteria

have been found in our water system on multiple occasions.

- Parts per Million (ppm) or Milligrams per Liter (mg/L) are units of measure for concentration of a contaminant. A part per million corresponds to one second in a little over 11.5 days.
- Parts per Billion (ppb) or Micrograms per Liter ($\mu\text{g/L}$) are units of measure for concentration of a contaminant. A part per billion corresponds to one second in 31.7 years.
- The "<" symbol: A symbol which means less than. A result of <5 means that the lowest level that could be detected was 5 and the contaminant in that sample was not detected.
- Picocuries per liter (pCi/L): A common measure of radioactivity.
- PFAS: Per- and polyfluoroalkyl substances (PFAS) are a group of man-made chemicals applied to many industrial, commercial and consumer products to make them waterproof, stain resistant, or nonstick. PFAS are also used in products like cosmetics, fast food packaging, and a type of firefighting foam called aqueous film forming foam (AFFF) which are used mainly on large spills of flammable liquids, such as jet fuel. PFAS are classified as contaminants of emerging concern, meaning that research into the harm they may cause to human health is still ongoing.



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

November 22, 2021

JEREMY GREENWOOD
ST. CLAIRSVILLE, CITY OF PWS
100 NORTH MARKET STREET
P.O BOX 537
ST. CLAIRSVILLE, OH 43950

RE: ST. CLAIRSVILLE, CITY OF PWS
NOV
Drinking Water Program
Belmont County
PWS ID: OH0701516

Subject: Failure to Monitor Drinking Water

St. Clairsville, City Of PWS is in violation of Ohio Administrative Code Rule (OAC) 3745-81-24 for failing to monitor your drinking water during the Third Quarter of 2021 monitoring period and/or report results for the following contaminants: Disinfection By-Products.

In order to return to compliance, St. Clairsville, City Of PWS must take the following actions:

1. Notify your customers using the enclosed instructions and public notice.
2. Complete and submit a verification form with a copy of the public notice to "Ohio EPA – DDAGW, Lazarus Government Center, P.O. Box 1049, Columbus, Ohio 43216-1049, Attn: Compliance Assurance" or via email to hayley.zimmerman@epa.ohio.gov.
3. Promptly collect your next sample according to your most recent monitoring schedule.
4. Submit the sample for analysis to a certified laboratory. A list of certified laboratories is online at <https://epa.ohio.gov/ddagw/labcert#161814872-certified-laboratories>.
5. For a community water system, include in the Consumer Confidence Report (CCR) a clear explanation of the violation including the length of the violation, the potential adverse health effects, and actions taken by the system to address the violation. The mandatory health effects language for the particular contaminant is specified in the appendix to OAC section 3745-96-02.

Your prompt attention to this matter is greatly appreciated. Continued noncompliance may lead to enforcement actions. If you have any questions, or if the required sample analysis was performed, please call me at (614) 644-2752 or email me at hayley.zimmerman@epa.ohio.gov.

Ensure confidence in the quality of your water and save money by sampling on time. It costs an average of \$25 for each total coliform sample and \$20 for each nitrate sample. **Failing to sample for total coliform or nitrate will cost you \$150 or more in penalties for each monitoring violation. Save a Dime. Sample on Time!**

Sincerely,
Hayley Zimmerman
Division of Drinking and Ground Waters
Enclosure: Public Notice, Verification Form
ec: SEDO DOCC, DDAGW

PUBLIC NOTICE INSTRUCTIONS AND VERIFICATION FORM FOR COMMUNITY PUBLIC WATER SYSTEMS WITH TIER 3 VIOLATIONS

The owner or operator of a community public water system with a Tier 3 violation or situation shall notify the persons served by the public water system as soon as practical but no later than one year after the system learns of the violation. At a minimum, community public water systems must issue the notice by mail or other direct delivery. Public notice issued by other methods shall be repeated annually as long as the violation or situation persists.

I HEREBY CERTIFY THAT THE PUBLIC WAS NOTIFIED BY THE FOLLOWING METHOD(S) INDICATED BELOW, AS DESCRIBED IN THE OHIO ADMINISTRATIVE CODE RULE 3745-81-32:

Required Method of Public Notification	Actual Method of Public Notification
<p>Use one or more of the following methods to reach all persons served by the public water system:</p> <p>Public notice issued by mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the public water system. <i>The consumer confidence report (CCR) delivered to customers by July 1 of each year may be used as long as the public notice includes all the required content and is delivered within the required timeframe.</i></p>	<p>Describe actual methods used to notify public of the violation:</p> <p>Date of mailing/delivery <u>9-28-22</u></p> <p>Please check if public notice was included in the yearly CCR <input checked="" type="checkbox"/></p>
<p>If the above methods do not reach all persons served, also use any other method reasonably calculated to reach other persons regularly served by the public water system (e.g. publication in a local newspaper or newsletter, delivery of multiple copies for distribution by customers that provide their drinking water to others, posting in public places served by the system, use of e-mail or the Internet to notify employees or students, or delivery community organizations). If the notice is posted, it shall remain in place as long as the violation exists, but in no case less than 7 days.</p>	<p>A. Method(s) <u>Website WWW.STCLAIRSVILLE.ORG</u></p> <p>B. Date(s) <u>9-28-22 (Revised)</u></p>

Please indicate below what public notice was used. **INCLUDE A COPY OF THE PUBLIC NOTICE.**

☒ A public notice as provided was issued without changes.

☐ A different public notice was issued after consulting with Ohio EPA on _____.

Jeff Mottle 9-28-22
Signature of Responsible Person Date

Jeff MOTTLE ORC
Printed Name and Title of Responsible Person

PWS NAME: ST. CLAIRSVILLE, CITY OF
PWS
PWSID: OH0701516
Facility ID: DS1
COUNTY: BELMONT
MONITORING, ROUTINE (DBP), MAJOR
4Q2021; Vio ID 10780

DRINKING WATER NOTICE

Monitoring requirements not met for St. Clairsville, City Of PWS

We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not our drinking water meets health standards. During the Fourth Quarter of 2021 time period we did not monitor for the following contaminants and therefore cannot be sure of the quality of our drinking water during that time: Disinfection By-Products.

What Should I Do?

This notice is to inform you that St. Clairsville, City Of PWS did not monitor and report results for the presence of the contaminants listed above in the public drinking water system during the Fourth Quarter of 2021 time period, as required by the Ohio Environmental Protection Agency. You do not need to take any actions in response to this notice.

What Is Being Done?

Upon being notified of this violation, the water supply was required to have the drinking water analyzed for the above mentioned parameters. The water supplier will take steps to ensure that adequate monitoring will be performed in the future.

A sample was (will be) collected on 11-2-2021.

Sample results and additional information may be obtained by contacting St. Clairsville, City Of PWS at:

Contact Person: Jeff Mottle.

Phone Number: (740) 695-1161.

Mailing Address: 100 N. Market St. St. Clairsville OH 43400

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

PWSID: OH0701516 Facility ID: DS1

Date Distributed: 9-28-22 (Revised)



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

NOTICE OF VIOLATION

May 23, 2022

Electronically Transmitted

**RE: City of St. Clairsville
Notice of Violation
Related Correspondence
Drinking Water Program
Belmont County
PWS ID OH0701516**

City of St. Clairsville
Attn: Kathryn Thalman, Mayor
100 N. Market Street
St. Clairsville, OH 43950

Subject: LSSV – Facility ID# 0752977, (COMMUNITY)

Dear Mayor Thalman:

On May 12, 2022, Alix Teisinger, Brooke Cherry, Kristen Andrews, and I conducted a Limited Scope Site Visit (LSSV) of the St. Clairsville public water system (PWS). The purpose of our inspection was to determine your facility's compliance with Ohio's drinking water laws as found in Chapter 6109 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC). Our inspection included a review of records associated with facility operations.

During the inspection Ohio EPA observed the following violations of Chapter 6109 of the ORC and Chapter 3745 of the OAC.

SIGNIFICANT DEFICIENCY

During the LSSV, a significant deficiency was identified. In accordance with OAC rules 3745-81-60 and 3745-81-61, your public water system shall respond in writing within thirty days of the date of this letter indicating how and on what schedule the public water system will address the following significant deficiencies. Whenever feasible, a public water system shall correct a significant deficiency within thirty days of notification. When a public water system is not able to complete a corrective action for a significant deficiency within thirty days, the system shall submit a plan within thirty days of the date of the notice of violation with a schedule for completing corrective actions and correct the significant deficiency according to the schedule accepted by the director. Consultation with your Ohio EPA district office representative prior to submitting a plan is encouraged.

1. **In accordance with OAC Rule 3745-83-01(H), Operational Requirements:** *"The owner and operator shall ensure that all facilities and equipment necessary for the treatment and distribution of water shall be maintained, at a minimum so as to function as intended."*
 - (a) High Service Pump #1 is out of service and not operational.
 - (b) There are two (2) High Service Pumps at the plant. Failure of High Service Pump #2 could cause catastrophic failure of the water treatment plant and an unacceptable risk to public health.
 - (c) In order to return to compliance, the PWS must provide a schedule to service or replace High Service Pump #1 with an equal or greater capacity pump.

City of St. Clairsville PWS
May 23, 2022
Page 2

Failure to correct a significant deficiency violation in accordance with a schedule accepted by the Director represents a treatment technique violation and the water system would be required to issue a Tier 2 public notice to their water consumers.

Please note that any modifications to your well, treatment system or distribution system may require prior plan approval. Please contact me if you plan on making any changes.

If you have already resolved the violations listed above, thank you, and please provide documentation supporting compliance. If you have not yet addressed the violations, please submit a compliance plan on how the company plans to correct the violation cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to Emily.Deshaies@epa.ohio.gov

Failure to comply with Chapter 6109 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, St. Clairsville PWS shall submit written correspondence describing the steps that will be taken and dates when compliance will be achieved.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 6109.23 and 6109.33 of the Ohio Revised Code.

If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me by email Emily.Deshaies@epa.ohio.gov or by phone at (740) 380-5253.

Sincerely,

Emily Deshaies
Environmental Specialist
Division of Drinking and Ground Waters

ED/cd

ec: Kathryn Thalman, Mayor, kthalman@stclairsville.com
Jeff Mottle, ORC, jmottle@stclairsville.com
Jeremy Greenwood, Director of Public Service/Safety, jgreenwood@stclairsville.com
Rich Lucas, Belmont County Health Department, rlucas@belmontcountyhealth.com
Tya Darden, Compliance Assurance, DDAGW-CO



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

Notice of Violation

February 7, 2023

Transmitted Electronically

RE: City of St. Clairsville PWS
Notice of Violation
Drinking Water Program
Belmont County
PWS ID OH0701516

JEREMY GREENWOOD,
ADMINISTRATIVE CONTACT
PO BOX 537
ST CLAIRSVILLE, OH 43950

Subject: Notice of Violation – Failure to collect both raw and finished water for Total Organic Carbon (TOC) sample Facility ID# 752977, (COMM)

Dear Mr. Greenwood:

The City of St. Clairsville public water system is in violation of Ohio Administrative Code (OAC) Rule OAC) Rule 3745-81-77(B)(1) for failure to collect a both raw and finished water Total Organic Carbon (TOC) sample during December 2022.

ACTION REQUIRED:

1. OAC Rule 3745-81-32(D) requires your public water system to provide a Tier 3 public notice as soon as practical, but no later than one year after the public water system learns of the violation or situation. The following forms of delivery shall be used in order to reach all persons served:
 - (a) Mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the public water system.
 - (b) Any other method reasonably calculated to reach other persons regularly served by the system, if they would not normally be reached by the notice required in **paragraph (D)(2)(a) of this rule** (OAC Rule 3745-81-32). Such persons may include those who do not pay water bills or do not have service connection addresses (e.g., house renters, apartment dwellers, university students, nursing home patients, prison inmates, etc.)
 - (c) Other methods may include: publication in a local newspaper; delivery of multiple copies for distribution by customers that provide their drinking water to others (e.g., apartment building owners or large private employers); posting in public places or on the Internet; or delivery to community organizations. If the public notice is posted, the notice shall remain in place for as long as the violation or other situation persists, but in no case less than seven days (even if the violation or situation is resolved).

- (d) The consumer confidence report (CCR) required under Chapter 3745-96 of the Administrative Code may be used as a vehicle for the initial public notice and all required repeat notices, as long as: (i) The CCR is provided to persons served within the time frames specified in paragraph (D)(2) of this rule; and (ii) the notice contained in the CCR follows the content requirements under this rule; and (iii) the CCR is distributed following the delivery requirements in this rule.
2. The required public notice is included with this correspondence. The public notice must be issued as shown. Any modifications to the public notice must be approved by the Ohio EPA Southeast District Office prior to issuance. **A copy of both the public notice (as issued) and the completed verification form must be returned to the Ohio EPA Southeast District Office at the letterhead address or emailed to Alix.Teisinger@epa.ohio.gov within ten (10) days after issuing the notice.**

The required public notice is included with this correspondence. The public notice must be issued as shown. Any modifications to the public notice must be approved by the Ohio EPA Southeast District Office prior to issuance.

If you have already resolved the violations listed above, thank you, and please provide documentation supporting compliance. If you have not yet addressed the violations, please submit a compliance plan on how the PWS plans to correct the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to Alix.Teisinger@epa.ohio.gov.

Failure to comply with Chapter 6109 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, City of St. Clairsville PWS shall submit written correspondence describing the steps that will be taken and dates when compliance will be achieved.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 6109.23 and 6109.33 of the Ohio Revised Code.

City of St. Clairsville PWS
February 7, 2023
Page 3

If you have any questions, please call me at 740-380-5424. E-mail is also available at alix.teisinger@epa.ohio.gov.

Sincerely,

A handwritten signature in cursive script that reads "Alix Teisinger".

Alix Teisinger
Environmental Specialist
Division of Drinking and Ground Waters

Enclosures: Tier 3 Public Notification
Public Notice Instructions and Verification Form

cc: Jeremy Greenwood, Administrative Contact
Jeff Mottle, ORC
Rich Lucas, Belmont County Health Department,
rlucas@belmontcountyhealth.com

DRINKING WATER NOTICE

City of St. Clairsville Did Not Meet Monitoring and Reporting Requirements

During the month of December 2022, a Total Organic Carbon (TOC) for both raw and finished was not collected, as required.

Total organic carbon (TOC) has no health effects. However, total organic carbon provides a medium for the formation of disinfection byproducts. These byproducts include total trihalomethanes (TTHMs) and haloacetic acids (HAAs). Drinking water containing these byproducts in excess of the MCL may lead to adverse health effects, liver or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.

What Should I Do?

There is nothing you need to do at this time. You do not need to boil your water or take other corrective action.

What is being done?

We are investigating and taking the necessary steps to correct the problem as soon as possible. We are taking steps to ensure that adequate monitoring will be performed in the future.

For more information, please contact _____ at _____ or _____.
name of contact phone number mailing address

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

PWSID#: OH0701516 Date distributed: _____

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What Should I Do?

There is nothing you need to do at this time. You do not need to boil your water or take other corrective action.

What is being done?

We are investigating and taking the necessary steps to correct the problem as soon as possible. We are taking steps to ensure that adequate monitoring will be performed in the future.

For more information, please contact Jeff Miller at (740) 695-1169 or stclairsville@stclairsville.com
name of contact phone number mailing address

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

PWSID#: OH0701516 Date distributed: 6-29-23

PUBLIC NOTICE INSTRUCTIONS AND VERIFICATION FORM FOR COMMUNITY PUBLIC WATER SYSTEMS WITH TIER 3 VIOLATIONS

The owner or operator of a community public water system with a Tier 3 violation or situation shall notify the persons served by the public water system as soon as practical but **no later than one year** after the system learns of the violation or situation. At a minimum, community public water systems must issue the notice **by mail or other direct delivery**. Public notice issued by methods other than posting shall be repeated annually as long as the violation or situation persists.

I HEREBY CERTIFY THAT THE PUBLIC WAS NOTIFIED BY THE FOLLOWING METHOD(S) INDICATED BELOW, AS DESCRIBED IN THE OHIO ADMINISTRATIVE CODE RULE 3745-81-32:

Required Method of Public Notification	Actual Method of Public Notification
<p>Use the following method to reach all persons served by the public water system:</p> <p>Public notice issued by mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the public water system. The consumer confidence report delivered to customers by July 1 of each year may be used as long as the public notice includes all the required content and is delivered within the required timeframe.</p>	<p>Describe actual methods used to notify public of the violation:</p> <p>A. Date of mailing/delivery <u>6-29-23</u></p>
<p>If the above methods do not reach all persons served, also use any other method reasonably calculated to reach other persons regularly served by the public water system (e.g. publication in a local newspaper, delivery of multiple copies for distribution by customers that provide their drinking water to others, posting in public places served by the system or on the Internet, or delivery to community organizations). If the notice is posted, it shall remain in place as long as the violation exists, but in no case less than 7 days.</p>	<p>A. Method(s) <u>Website</u> <u>StClairsville.com</u> <u>Posted in City Building</u> <u>Library, Courthouse</u></p> <p>B. Date(s) <u>6-29-23</u></p>

Please check if the public notice used was provided by Ohio EPA (other side of this form) or another acceptable notice was used:

- ☐ A public notice as shown on the other side of this sheet was issued without changes.
- ☐ A different public notice was issued. **INCLUDE A COPY OF THE PUBLIC NOTICE.**

Jeff Motte 6-29-23
Signature of Responsible Person Date

Jeff Motte Operator of Record
Printed Name and Title of Responsible Person

PWS NAME: St. Clairsville PWS
PWSID: OH0701516
Facility ID: 752977
County: Belmont
Type 27: 5119452
Time Period: December 2022

For Ohio EPA use only:

Date PN received: _____
PN acceptable: _____ PN not acceptable: _____



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

March 1, 2023

Transmitted Electronically

**RE: City of St. Clairsville
Notice of Violation
Related Correspondence
Drinking Water Program
Belmont County
PWS ID OH0701516**

City of St. Clairsville
Attn: Kathryn Thalman, Mayor
100 N. Market Street
St. Clairsville, OH 43950

Subject: Partial Resolution of Violation and Schedule Acceptance

Dear Mayor Thalman:

Thank you for your February 6, 2023, response to Ohio EPA's Notice of Violation (NOV) letter dated September 9, 2019, regarding the sanitary survey conducted at the St. Clairsville public water system (PWS) on August 27th and 28th, 2019. The City of St. Clairsville has proposed an acceptable schedule for the remaining violations discovered during the August 27th and 28th, 2019, sanitary survey.

Outstanding Notice of Violation

- 1. In accordance with OAC Rule 3745-83-01(H)(1) and NOV letter violation citation number 19; *"The owner and operator shall ensure that all facilities and equipment necessary for the treatment and distribution of water shall be maintained, at a minimum so as to function as intended."***

At the time of the August 27th and 28th, 2019 sanitary survey, the following was noted about the water treatment plant:

- a. The overall condition of the surface water treatment plant was poor. The city needed to evaluate the viability of making the needed improvements to the existing surface water treatment plant or decommission the treatment plant and find an alternative source of water.
- b. The city was required as part of its response to the Agency's June 29, 2018, NOV letter to submit a general plan detailing how it intends to move forward to ensure a safe, adequate supply of water for its customers. The city submitted responses dated July 26, 2018, March 22, 2019, and August 19, 2019, but did not adequately detail the selected alternative.
- c. The city must evaluate the options, select an alternative and submit a general plan detailing the long-term plan to ensure a safe, adequate supply of water for its customers.

- d. In accordance with Order No.3(h), of the May 11, 2020, DFFOs, the city was to evaluate and submit a long-term plan for ensuring a safe, adequate supply of water for Respondent's customers, within three (3) months of the effective date of the Orders. The City's May 21, 2021, response to Ohio EPA outlined the City's plan to permanently connect to an approved public water supply by May 11, 2022.
- e. On March 1, 2022, the City of St. Clairsville requested an extension of the time frames specified in the May 11, 2020, Director's Final Findings and Orders (Orders) issued, per the recommendations sent to Mayor Kathryn Thalman from Mr. Kelly Porter, Director of the Belmont County Water and Sewer district on February 24, 2022. The City of St. Clairsville has requested that the deadline for their permanent connection to the Belmont County's public water system, at Henderson Road from the McMahon Creek Pump Station, be extended until September 11, 2022. The reason given for the time extension request is that Belmont County will not be able to meet the City of St. Clairsville's daily water demands before August 11, 2022. This schedule was approved by Ohio EPA's Division of Drinking and Ground Waters on March 18, 2022.
- f. On September 8, 2022, the City of St. Clairsville provided a letter from Belmont County Water and Sewer District explaining that the preliminary steps needed for St. Clairsville to connect to BCWSD #3 are expected to be completed in mid-December 2022. As a result of this delay, St. Clairsville has requested a five (5) month extension, until mid-February 2023 to complete the connection to Belmont County's public water system. Ohio EPA accepts this schedule, and approves a February 17, 2023, compliance date.
- g. On February 6, 2023, the City of St. Clairsville provided a letter from Belmont County Water and Sewer District indicating that there have been delays in the project which will connect St. Clairsville to BCWSD #3 until May 31, 2023. As a result of the delay, St. Clairsville has requested an eight (8) month extension, until the end of October 2023 to complete the connection to Belmont County's public water system. Ohio EPA accepts this schedule and approves the October 31, 2023, compliance date.
Therefore, this violation has not yet been resolved.

2. In accordance with OAC Rule 3745-83-01(H)(1) and NOV letter violation citation number 17, *"The owner and operator shall ensure that all facilities and equipment necessary for the treatment and distribution of water shall be maintained, at a minimum so as to function as intended."*

- a. At the time of the August 27th and 28th, 2019, sanitary survey, the Provident reservoir was reported as being rarely used, typically only a few times a year to exercise the pumps. It was also reported that the reservoir needed to be dredged and was not a viable alternative source of water.

- b. Documentation was received on April 20, 2020, stating a Diversified Engineering Report was generated on December 23, 2019, regarding the Provident Reservoir. The report determined the reservoir would not be a sufficient secondary source and should be deactivated as a potable water source for the City.
- c. The city has signed Director's Final Findings & Orders with an effective date of May 11, 2020 (May 11, 2020, DFFOs). In accordance with Order No.3(g), of the May 11, 2020 DFFOs, if the Provident Reservoir is determined to be an unviable source of water, a plan must be developed to clearly identify a back-up water source (which can be utilized as a water reserve for at minimum 200 days) and for separation of the reservoir from the water system; and documentation of such plans submitted to Ohio WPA, within three (3) months of the effective date of the Orders.
- d. On December 8, 2020, the City of St. Clairsville provided engineering drawings of a permanent connection to the Belmont County water system to allow it to be in place within 2 years for supplying 100% of the City's needs and advised that during this time, this reservoir is being maintained as part of the current surface water reservoir system, with copper sulfate being used to treat for algae every two weeks. The City's December 8, 2020 response also indicated that the reservoir is connected to the water system by a pumped water line routed from a simplex booster station at the Provident Reservoir to a discharge point in the Main Reservoir upstream from the intake structure of the Provident reservoir, and that the separation of the Provident Reservoir from the Main Reservoir is achieved by removing the pump, piping, and electric equipment inside the booster station and by disconnecting the electric service from the booster station.
- e. On March 1, 2022, the City of St. Clairsville requested an extension of the time frames specified in the May 11, 2020, Director's Final Findings and Orders (Orders) issued, per the recommendations sent to Mayor Kathryn Thalman from Mr. Kelly Porter, Director of the Belmont County Water and Sewer district on February 24, 2022. The City of St. Clairsville has requested that the deadline for their permanent connection to the Belmont County's public water system, at Henderson Road from the McMahon Creek Pump Station, be extended until September 11, 2022. The reason given for the time extension request is that Belmont County will not be able to meet the City of St. Clairsville's daily water demands before August 11, 2022. This schedule was approved by Ohio EPA's Division of Drinking and Ground Waters on March 18, 2022.
- f. In accordance with Order No.4, of the May 11, 2020, DFFOs, upon Ohio EPA DDAGW's acceptance of any plans required in Order Nos. 3(b), 3(g) and 3(h), Respondent shall implement the plans in accordance with the accepted implementation schedules.

- g. On September 8, 2022, the City of St. Clairsville provided a letter from Belmont County Water and Sewer District explaining that the preliminary steps needed for St. Clairsville to connect to BCWSD #3 are expected to be completed in mid-December 2022. As a result of this delay, St. Clairsville has requested a five (5) month extension, until mid-February 2023 to complete the connection to Belmont County's public water system. Ohio EPA accepts this schedule, and approves a February 17, 2023, compliance date.
- h. On February 6, 2023, the City of St. Clairsville provided a letter from Belmont County Water and Sewer District indicating that there have been delays in the project which will connect St. Clairsville to BCWSD #3 until May 31, 2023. As a result of the delay, St. Clairsville has requested an eight (8) month extension, until the end of October 2023 to complete the connection to Belmont County's public water system. Ohio EPA accepts this schedule and approves the October 31, 2023, compliance date.
Therefore, this violation has not yet been resolved.

Conclusion

Please be advised that violations cited above will continue until the violations have been properly resolved. Failure to comply with Chapter 6109 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty of up to \$25,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the resolution of violations, the City of St. Clairsville is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

City of St. Clairsville
March 1, 2023
Page 5

If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me by email alix.teisinger@epa.ohio.gov or by phone at (740) 380-5424.

Sincerely,

Alix Teisinger

Alix Teisinger
Environmental Specialist
Division of Drinking and Ground Waters
Southeast District Office

AT/cd

ec: Kathryn Thalman, Mayor, kthalman@stclairsville.com
Jeff Mottle, ORC, jmottle@stclairsville.com
Jeremy Greenwood, Director of Public Service/Safety,
jgreenwood@stclairsville.com
Rich Lucas, Belmont County Health Department,
rlucas@belmontcountyhealth.com
Aaron Pennington, DSW-SEDO
Tya Darden, Compliance Assurance, DDAGW-CO
Kaitlyn Barrie, Enforcement, DDAGW-CO