February 24, 2017 Mr. Lynn Johnson Johnson Mobile Home Park 10951 Borror Road Orient, Ohio 43146 Facility ID # 6557186 Operator PWS ID# 6557186

EPA Central District Office Lazarus Government Center 50 West Town Street Columbus, Ohio 43125 MAR 0 6 2017

Central District Office
Ohio EPA

Dear Ms. Katie Anderson:

Please find enclosed the paperwork regarding the Lead Mapping Distribution Systems for PWS. A copy of this report was mailed to the OHD and ODJFS office.

The mobile home park was founded in the mid 1950's. The well house that is located in the middle row was built when the park first opened. When our parents bought the park in 1970, the building was there and part of it housed the well, and there were laundry facilities. (A wringer washer and one or two dryers.)

My parents took out the laundry area when father upgraded the water system, do not know the date, nor do I know when well #1 went out of service. We currently have 2 wells, the one by the well house is Well #2 and I believe in the early 1990's we had well #3 dug. I moved from the area in January 1976 so I was not involved too much with the business until my return in 2009.

However, it is to my knowledge and my brother's knowledge that the main water lines throughout the mobile home park property are all black plastic. Inside the well house the pipe is plastic. Any clamps that are used throughout the water supply system are the metal adjustable clamps.

The stand pipe that rises out of the ground which connects the main line to each individual home main supply is galvanized pipe.

None of the service lines from the standpipe to the mobile homes are lead or galvanized.

There are 48 lots in the park, plus the office located at 10951 Borror Rd. The park's address of the tenants is 10901 Borror Rd.

The following lots have homes on them but are vacant and when the park remodels these homes the supply line will be changed to plastic if need be:

100, 104, 107, 108, 19, 21, 23, 25, 31, 33, 35, 43 and lot 44

The following lots do not have homes on them at this time: 39, 41, 14, 28, and 40.

Lot numbers 10, 11, 42 and the park office has copper service lines

Lot # 101, 102, 103, 105, 106, 109, 13, 15, 27, 29, 37, 45, 47, 49, 12, 16, 18, 20, 24, 26, 30, 32, 34, 36, 38 have plastic service lines.

Sincerely,

(Mr./Lynn Johnson

Johnson Mobile Home Park Office Mr. Lynn Johnson 10951 Borror Road Orient, Ohio 43146 Operator PWS ID OH6502312 Facility ID 6557186 Office # 614- 877-3849, Cell #510- 882-5310



Ohio Department Of EPA- Division of Drinking & Ground Water ATTN: Ms. Katie Anderson P.O. 1049
Columbus, Ohio 183204

Dear Ms. Katie Anderson:

Please find enclosed a layout of Johnson Mobile Home Park located at 10901 Borror Rd. Orient, OH 43146 and please note the park office is adjacent to the park (10951 Borror Rd.) and is supplied by the same water system for the mobile home park.

Also please find enclosed a list of all residents and the type of service line they currently have and also enclosed is the lead and copper information for the five residents we took samples from in 2016.

As best to our knowledge, there are no lead service lines being used in the mobile home park and none of the service lines is lead.

All of the standpipes (leading from the water main to the individual mobile homes) that are hooked up from the main water supply connecting to the service line of said mobile home are galvanized. The shut-off valves are brass.

Lot #100 #104, 107, #108l, #19, #21, #23, #25, #31, #33, #43 and #44 do have mobile homes on the lot which are not connected to the water supply. They are vacant. When they are remolded the service lines will be plastic. These homes belong to the mobile home park.

Lot #39, #41, #14, #28 are vacant lots. They do not have any mobiles homes on the lot. If a mobile home is installed on the lot, the service line probably be plastic.

Lot # 11, #10 and #42 and the park office located at 10951 Borror Rd. Orient, Ohio 43146 have copper service lines.

Lot # 101, #102, #103, #105, #106, #109, #13, #15, #17, #27, #29, #37, #45, #47, #49, #12, #16, #18, #20, #22, #24, #26, #30, #32, #34, #36 and #38 have plastic service lines.

There are 2 wells for the mobile home park and the water line for both wells is plastic and any sections of pipe that are joined together are bound by adjustable metal clamps. Well #2 was drilled in the late 1970's or early 1980's and well #3 was drilled in the mid 1990's.

The well house was built back in the mid 1950's when the park was first built. It is a cinder-block building. All the water lines in the well house are plastic. The well house does not contain any lead or galvanized pipe regarding the water supply. The water meter is lead- free and so are the brass shut-off ball valves. The mobile home park well house also uses plastic shut-off valves for the water supply.) The characteristics of buildings and piping solder or fixtures would be buildings in Ohio built prior to 1998 or that use plumbing material or solder manufactured before 1998 may have materials with greater than 8% lead and are at higher risk of contributing lead to the drinking materials manufactured after 1998. In addition, buildings built and plumbing materials manufactured after 2014 were required to

have less than 0.25% lead by weight and have the lowest risk of contributing lead to the drinking water, It should be noted however that, although prohibited, some of the leaded solder or leaded components may have occurred after the prohibitions became effective.

Currently there are mobile homes in the park that range from 1961 to 2010. None of the homes that we are aware of have any lead water lines being used inside of the homes.

If you are in need of any clarification please do not hesitate to call. Charles Johnson's cell number is (614) 205-0482 or (Mr.) Lynn Johnson, cell number is (510) 882-5310. Sincerely,

Mr. Lynn Johnson

Johnson Mobile Home Park

that lead could have been used for service line materials unless the age of the area or specific information exists to rule out lead.

V. IDENTIFYING CHARACTERISTICS OF BUILDINGS WITH LEAD PIPING, SOLDER OR FIXTURES

In 1986, the SDWA was amended to ban the use of lead solders which contain more than 0.2% lead. The lead ban provisions of the act became effective in Ohio Plumbing Code on March 30, 1998. The SDWA amendments also required the use of lead-free flux, pipes and fittings in new installations and repairs of public water systems, or any plumbing within a residential or nonresidential facility which provides water for human consumption. Lead-free was defined at the time as having no more than 8.0% lead (note this 8.0% was lowered to 0.25% in 2014).

In 1996, the SDWA was further amended to state the following is unlawful:

- 1. For any person to introduce into commerce any pipe, pipe fitting, plumbing fitting or plumbing fixture, that is not lead free, except for a pipe that is used in manufacturing or industrial processing; or
- 2. Any person engaged in the business of selling plumbing supplies; except manufacturers, to sell solder or flux that is not lead free; or
- 3. Any person to introduce into commerce any solder or flux that is not lead free unless the solder or flux bears a prominent label stating that it is illegal to use the solder or flux in the installation or repair of any plumbing providing water for human consumption.

In 2011, SDWA Section 1417 was amended for the prohibition on use and introduction into commerce of lead pipes, solder and flux. These new requirements became effective on January 1, 2014. The amendments specifically modified the applicability of the prohibitions by creating exemptions for certain non-potable applications, changed the definition of "lead-free" by reducing lead content from 8% to a weighted average of not more than 0.25% in the wetted surface material (primarily affects brass/bronze), eliminated the provision that required certain products to comply with "voluntary" standards for lead leaching, and established a statutory requirement for calculating lead content.

The exemptions to the SDWA Section 1417 are pipes, pipe fittings, plumbing fittings or fixtures, including backflow preventers, which are used exclusively for non-potable services, such as manufacturing, industrial processing, irrigation, outdoor watering, or any other uses where the water is not anticipated to be used for human consumption. The exemption also applies to toilets, bidets, urinals, fill valves, flushometer valves, tub fillers, shower valves, service saddles, or water distribution main gate valves that are 2 inches in diameter or larger. In addition to the SDWA, the Community Fire Safety Act of 2013 exempted fire hydrants from this requirement.

As a result of these amendments, buildings constructed after 2014 are the least likely to have plumbing containing lead materials, so these consumers are at the lowest risk of exposure to lead from drinking water.

Because it is practically impossible to determine the lead content of an installed fixture, fitting or pipe, it should be assumed that the manufacture or installation date is the primary indicator of the lead content. Therefore, the characteristics of buildings and piping solder or fixtures would be buildings in Ohio built prior to 1998 or that use plumbing material or solder manufactured before 1998 may have materials with greater than 8% lead and are at a higher risk of contributing lead to the drinking water than materials manufactured after 1998. In addition, buildings built and plumbing materials manufactured after 2014 were required to have less than 0.25% lead by weight and have the lowest risk for contributing lead to the drinking water. It should be noted however that, although prohibited, some use of leaded solder or leaded components may have occurred after the prohibitions became effective.

