

3/8/2017

WATER DISTRIBUTION LINES

BUCKEYE BEACH MARINA MAP

PWS-2302212

NO LEAD SERVICE LINES



Ohio EPA
Central District Office
Lazarus Government Center
50 W. Town St., Suite 700
PO Box 1049
Columbus, OH 43215

March 2, 2017

**Re: Lead and Copper Notification, HB 512
Buckeye Beach Marina MHP, OH2302212**

To Central District Ohio EPA:

Please allow this letter to fulfill the requirements of HB512, requiring Lead Service Line Identification for the Buckeye Beach Marina MHP, PWS, OH2302212.

The Buckeye Beach Marina Mobile Home Park Water System consists a water distribution system serving 43 mobile homes. The distribution system consists of PVC and Copper pipes. This has been verified through visual inspection and repair of the water system by the Park Manager and a local plumber that has worked on the system for many years.

Attached, please find the Verification Form of no lead service lines.

If you require additional information, please contact me.

Regards,



Brandon Fox
Operator

Cc: Bonita Bair, Owner
OEPA, Michael.deal@epa.ohio.gov
Ohio Dept. of Health, Lead Program, BEH@odh.ohio.gov
Ohio DJFS, Bureau of Child Care and Licensing and Monitoring

**VERIFICATION FORM FOR COMMUNITY PUBLIC WATER SYSTEMS
CLAIMING NO LEAD SERVICE LINES**

The owner or operator of all community public water systems must identify and map areas of their distribution system that are known or are likely to contain lead service lines. Systems must submit a copy of the applicable map to the Ohio Department of Health and the Ohio Department of Job and Family Services. Systems must also submit a report to the director containing at least both of the following: (1) The applicable map with narrative, and (2) A list of sampling locations used to collect samples as required by Ohio Revised Code (ORC) Section 6109.121 and any rules adopted thereunder, including contact information for the owner and occupant of each sampling site.

Should a water system determine no lead service lines exist in their distribution system, they must provide information stating they reviewed, at the minimum, historical permit records and local ordinances, distribution maintenance records and information pertaining to installation dates or materials for all services lines. This information must be verified below.

I HEREBY CERTIFY THAT THE FOLLOWING METHOD(S) WERE USED TO DETERMINE NO LEAD SERVICE LINES EXIST IN THIS WATER SYSTEM'S DISTRIBUTION SYSTEM, AS REQUIRED BY ORC 6109.121(F):

LEAD SERVICE LINE VERIFICATION
<p>This PWS states they have no lead service lines and has reviewed the following information (select one or more of the following):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Historical permit records and/or local ordinances <input checked="" type="checkbox"/> Distribution maintenance records (i.e. meter replacement, waterline break repairs) <input type="checkbox"/> Information pertaining to installation dates for all service lines (i.e. after 1986 when lead services lines were banned) <input type="checkbox"/> Service line material of all service lines is known (i.e. all service lines are known to be PVC)

Brandon Fox

3/3/2017

Signature of Responsible Person

Date

Brandon Fox, Operator

Printed Name and Title of Responsible Person

PWS NAME: Buckeye Beach Marina MHP

PWS ID: OH2302212

COUNTY: Fairfield

For Ohio EPA use only:

Date Verification Rec'd: _____

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.**