

# IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER MONITORING REQUIREMENTS NOT MET FOR

## SUMMIT PARK PSD, WV3301725

We are required to monitor your drinking water on a regular basis. Results of the regular monitoring are an indicator of whether or not our drinking water meets health standards. Between 1/1/2017 and 12/31/2019, we failed to submit the required sample as indicated below.

**What should I do?**

There is nothing you need to do at this time.

The table below lists the required monitoring and compliance period.

Required Monitoring	Compliance Period
52, FOLLOW-UP OR ROUTINE TAP M/R (LCR) LEAD & COPPER RULE Required Lead & Copper Sample Results Not Submitted as Required	1/1/2017 to 12/31/2019

**What happened? What is being done?** (Describe corrective action)

In 2017, Summit Park Public Service District (SPPSD) was required to submit a new and revised Lead & Copper Sampling Site Plan to the West Virginia Office of Environmental Health Services (OEHS). Delbert King Sr. of SPPSD visited several homes and identified 10 locations which qualified for Lead and Copper sampling and as recommended by the Fairmont District office of the OEHS, SPPSD included 2 alternate sampling sites in its sampling plan. The Plan was approved by the OEHS June 26, 2017. As per our schedule SPPSD staff distributed sample bottles to each location on the primary sampling list. Each sample was to be collected by the occupant of the premise, taking the sample after water in the household’s water pipes had been undisturbed for a period of no less than 6 hours and collecting the sample, as per the instructions included with the sample bottle. SPPSD staff picked up the samples on August 8, 2017. During our verification of the samples collected, we encountered one sample not in compliance with the sampling requirements. Upon review, staff determined that it would be necessary to use one of the approved alternates to replace the non-compliant sample.

The compliance samples were tested at Reliance Laboratory and all sampled results were within acceptable range. It was not until August 28, 2017 that SPPSD received an email from the Fairmont District Office of the OEHS that stated that water systems must ask permission from the OEHS before using an alternate site. Upon receiving this email our problems began. We had already completed our testing. Now what do we do?? The email, from our District Office, stated to call, before sampling to receive approval. Our General Manager, Mary Seymour called the Fairmont District Office to inquire as to what to do since we did not know this rule and had already taken our samples? Ms. Seymour was verbally told that our site change would be noted and acceptable, since the location used was listed on our approved sampling site plan.

On November 14, 2019, two years later, SPPSD received a Notice of Violation, number 2020--599218 from the West Virginia Department of Health and Human Resources, Bureau of Public Health, Office of Environmental Health Services, in Charleston WV. The letter was signed by Don Goldsmith, Compliance and Enforcement Environmental Engineering Division.

The notice stated that the Violation was for missing required Lead and Copper sample analyses results between 1/1/2017 and 12/31/2019. Ms. Seymour contacted Mr. Goldsmith to inquire what was wrong with the District’s samples and why did it take so long to receive the violation. She was told that SPPSD did not have written permission to use an alternate sample site and was out of compliance for not sampling at the required site, during the sampling period. Ms. Seymour stated that she was unaware that the request had to be in writing and that the Fairmont District Office verbally accepted the use of the alternate. She also mentioned the email from the Fairmont District Office, stating to call before testing, and that SPPSD had completed it’s testing before that notification was received.

Ms. Seymour asked Mr. Goldsmith over the phone if he would consider rescinding the Violation due to it being an unforeseen technical error, it was not due to water quality issues or any test being over the maximum contaminate levels. Mr. Goldsmith, who has moved on from the position of Compliance officer, in the conversation stated that the violation would stand.

Since Ms. Seymour was told verbally that the violation would stand, she thought it best to follow up the conversation by sending a formal written rescind request to Mr. Goldsmith. Ms. Seymour sent a detailed letter to Mr. Goldsmith requesting that he would reconsider and rescind the violation. The letter was sent certified and delivered on January 2, 2020. SPPSD has yet to receive a written denial of its request. On March 9, 2020 Ms. Seymour emailed Dawn Slekis, one of the new compliance officers, inquiring as to the status of the rescind request. Ms. Slekis replied on March 10, 2020 that Daniel Mace was the new compliance officer for our region and that she and he both were aware of our request and they both agreed with Mr. Goldsmith.

So, with all of that being said, all water customers of SPPSD are receiving this notice, as required by the Federal Safe Drinking Water Regulations 40 C.F.R. 141.32. Public notice is required when a violation is issued, to inform the public of a possible issue with the safety of drinking water in our water system. Had there been a real emergency SPPSD would have called you or the news stations would have made an announcement. SPPSD is required to use two methods of delivery. You will find a copy of this notice on our web site.

In addition to mailing this Violation Notice, there is a penalty for our mistake. The penalty issued was a requirement to increase the monitoring of Lead and Copper. What this means is instead of sampling 10 homes every 3 years, SPPSD must recruit 10 additional sites, to be monitored and must sample twice a year instead of every 3 years. The samples taken every three years cost the District, and you our customer, \$173.00 just in lab costs, not to mention labor and transportation cost to distribute and pick up the samples from each sample site. The new lab cost per year for 20 sample sites will cost the district's customers \$ 692.00, in addition to, increased man hours to manage the project twice a year, and training 10 new sampling participants. We also might add that by adding more participants to the collection process and increasing the frequency, there is also an increased opportunity for making errors, whether it be on the part of the sample taker or the staff handling and documenting the samples. I have heard that other water systems have received violations for spelling the name of the street wrong, because it doesn't match exactly with the name in the OEHS database! You can expect more of these notices to follow, if that be the case. Violation announcements are costly to produce and mail. This mailing cost over \$300 and if we did not mail this notice SPPSD would receive another violation for non-compliance.

Wish us luck with our sampling processes, please! Thank you for reading this notice and for your continued support of your community water system.

For more information, please contact Mary Seymour, General Manager at 304-623-5304 or Summit Park PSD, 100 Coal St, Clarksburg, WV 26301

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.

This notice is being sent to you by: **SUMMIT PARK PSD**

State Water System ID # WV3301725

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