



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

WATER SUPPLY INSPECTION REPORT

Facility Name PEPPER HILLS MOBILE HOME PARK	PWSID No 4470015	Inspection Date 2022-12-29
Facility Location 40 PEPPER HILLS DANVILLE, PA 17821	County Montour	Municipality Cooper
Responsible Officials Name Tia Martini-Spangenberg	Telephone: (570) 335-3666	
	System Type: Community	Population: 170
Certified Operator Name	Field Order Number: ----	
	Issue Date (mm/dd/yy): ----	

Person(s) Interviewed

Name: RYAN DETWEILER	Title: Operator
Name: PHILIP CHIAVACCI	Title: PROPERTY MANAGER
Name: VINCE CIANFICHI	Title: METER INSTALLER
Name: BRIAN HELFRICH	Title: DAILY NON-CERT OPERATOR AND TENANT

eFACTS info

Inspection ID: 3479674	Inspection Type WSEME
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Violations

A2A - 25 PA Code, §109.4(2) EP:100 - WELL HOUSE Remarks: FAILURE OR SIGNIFICANT INTERRUPTION IN KEY WATER TREATMENT PROCESSES. One of the six greensand filters are in bypass mode.

A3 - 25 PA Code, §109.701(a)(3)

EP:100 - WELL HOUSE

Remarks: FAILURE TO PROVIDE NOTIFICATION TO DEP WITHIN 1-HOUR OF DETERMINING THAT AN IMMEDIATE THREAT SITUATION EXISTS

A4A - 25 PA Code, §109.408

EP:100 - WELL HOUSE

Remarks: FAILURE TO PROVIDE TIER 1 PUBLIC NOTICE WITHIN 24 HRS. OF DETERMINING THAT AN IMMEDIATE THREAT EXISTS.

B6A - 25 PA Code, §109.4

EP:100 - WELL HOUSE

Remarks: OTHER VIOLATIONS DEEMED TO BE SIGNIFICANT DEFICIENCIES (PROLONGED WATER OUTAGE).

C4A - 25 PA Code, §109.4

EP:100 - WELL HOUSE

Remarks: FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM

Outstanding Violations**C4A - 25 PA Code, §109.4**

Remarks: The exterior coating of the storage tank is peeled, cracked, rusted or in need of cleaning. The exterior coating of the storage tank is peeled, cracked, rusted or in need of cleaning.

B1C - 25 PA Code, §109.4

Remarks: B1c: The water system is failing to prohibit any activities within the Zone 1 protection area, specifically including State Route 11 vehicular traffic, which are adversely impacting source quality or quantity, which is a violation of Title 25 Pa. Code 109.4.

B1c: The water system is failing to prohibit any activities within the Zone 1 protection area, which are adversely impacting source quality or quantity, which is a violation of Title 25 Pa. Code 109.4.

C1F - 25 PA Code, §109.608

Remarks: Cross-connection controls are not in place between potable and nonpotable water in the treatment plant. There is a 1" line in the treatment plant right after the wells combine that goes to the floor, but no one knows what it's for or where it goes.

Cross-connection controls are not in place between potable and nonpotable water in the treatment plant.

D2E - 25 PA Code, §109.1107(a)(1)

Remarks: The water system does not have a Lead and Copper Rule Sample Siting Plan that contains all required elements.

The water system does not have a Lead and Copper Rule Sample Siting Plan that contains all required elements.

B6A - 25 PA Code, §109.4

Remarks: B6a: Violations exist that are deemed to be a significant deficiency relating to the water storage, which is a violation of Title 25 Pa. Code 109.4. The CT tank exterior is in very poor shape. Many bolts are disintegrated and integrity could be compromised.

B6a: Violations exist that are deemed to be a significant deficiency relating to the water storage, which is a violation of Title 25 Pa. Code 109.4.

C7 - 25 PA Code, §109.703(a)

Remarks: The water system is not complying with special permit conditions relating to chemical addition, and/or iron /manganese treatment. As per permit 4707502, sodium hydroxide is not being fed, sampling for daily entry point total iron and pH, and sampling for weekly raw iron and pH is all not being conducted as required. Weekly raw iron had been conducted through July 2022.

The water system is not complying with special permit conditions relating to chemical addition, corrosion control, iron /manganese treatment and/or fluoridation.

C2H - 25 PA Code, §109.302

Remarks: The water system is not conducting special monitoring as required by the Department. The water system is not conducting special monitoring as required by the Department.

C7 - 25 PA Code, §109.703(a)

Remarks: The water system is not conducting all monitoring and reporting specified in the permit conditions.

The water system is not conducting all monitoring and reporting specified in the permit conditions.

C3B - 25 PA Code, §109.504(c)

Remarks: The chemicals, size of chemical pump and/or injection point locations being used for the disinfection treatment are not the same as those specified in the water system permit. The sodium hydroxide is no longer being used as per permit 4707502. Both chemical feed pumps have been changed and are not the same as what was permitted in 4707502.

The chemicals, size of chemical pump and/or injection point locations being used for the disinfection treatment are not the same as those specified in the water system permit.

C4A - 25 PA Code, §109.4

Remarks: Iron and/or manganese are not being monitored before and after treatment. As per permit 4707502, sampling for raw total iron weekly and entry point total iron daily is required. The new certified operators have a Hach DR900 for testing. Raw iron was being tested weekly up until July 2022. Entry point iron has not been conducted at all in 2022. Iron and/or manganese are not being monitored before and after treatment.

B6A - 25 PA Code, §109.4

Remarks: B6a: Violations exist that are deemed to be a significant deficiency relating to the treatment plant or treatment processes, which is a violation of Title 25 Pa. Code 109.4. The sodium hydroxide is no longer being used as per permit 4707502. Both chemical feed pumps have been changed from what was permitted in 4707502.

B6a: Violations exist that are deemed to be a significant deficiency relating to the treatment plant or treatment processes, which is a violation of Title 25 Pa. Code 109.4.

C1D - 25 PA Code, §109.606

Remarks: The treatment materials and/or equipment which come in contact with the water or drinking water treatment chemicals, specifically the chlorine and potassium permanganate chemical feed pumps, are NSF 50 certified, and do not meet the requirements of ANSI/NSF Standard 61. This does not meet the design standards set forth in the Public Water Supply Manual.

The treatment materials and/or equipment which come in contact with the water or drinking water treatment chemicals do not meet the requirements of ANSI/NSF Standard 61. This does not meet the design standards set forth in the Public Water Supply Manual.

B8A - 25 PA Code, §109.301

Remarks: B8a: The water system is chronically failing to conduct performance monitoring for total iron and pH at the entry point, which is a violation of Title 25 Pa. Code 109.301.

B8a: The water system is chronically failing to conduct compliance monitoring and/or performance monitoring, which is a violation of Title 25 Pa. Code 109.301.

B6A - 25 PA Code, §109.4

Remarks: B6a: Violations exist that are deemed to be a significant deficiency relating to monitoring and reporting, specifically the chronic failure to monitor for compliance at the entry point. This is a violation of Title 25 Pa. Code 109.4.

B6a: Violations exist that are deemed to be a significant deficiency relating to monitoring and reporting, which is a violation of Title 25 Pa. Code 109.4.

C9 - 25 PA Code, §109.202(b)

Remarks: At the time of inspection, the entry point measurements show iron and/or manganese to be greater than the secondary maximum contaminant levels. At the time of inspection, there were 133 of 239 days in 2022 where the iron level at the EP was equal to or in excess of the SMCL.

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C2A - 25 PA Code, §109.301

Remarks: Required performance monitoring samples are not collected as specified in the regulations.

Required performance monitoring samples are not collected as specified in the regulations.

D2G - 25 PA Code, §109.718

Remarks: The water system does not have a Comprehensive Monitoring Plan that contains all required elements. The Lead and Copper Rule plan is missing.

The water system does not have a Comprehensive Monitoring Plan that contains all required elements.

General Comments

Attendees: Ryan Detweiler, ESC; Phil Chiavacci, Property Manager; Vince Cianfichi, Valex Property Management; Brian Helfrich; Pepper Hills tenant and daily operator; Casey Silver, Valerie Elsasser, DEP.

Inspection to confirm the loss of pressure event over the course of the last week.

12/24/22: Water lines under some homes started to freeze. Phil was contacted. Phil indicated since some homes had water he thought it was not a PWS water issue, but an issue with the private portion of the water lines. Some homeowners called a plumbing company, but they didn't touch any plumbing. Phil was getting lists of who was out of water.

12/25/22: No one was onsite.

12/26/22: Phil, Vince, Terry, and Brian were onsite to investigate. There were 23 homes out of water at this point. (I'm not sure who Terry works for.)

12/27/22: Water lines thawed due to warmer ambient temperatures. The tank level was down to 1' overnight.

12/28/22: Loss of positive pressure (LOPP) around 11:30AM. Brian called Phil and made him aware. Phil called Ryan. William Dixon (certified operator, class D-8,12) was onsite at 3PM. Ryan was on the phone with William 6 times during the time he was here monitoring tank levels and assisting with leak detection. Vince was here also to assist with leak detection and to post BWA by taping to each front door from approximately 1800-2000. Phil had Brenda send a notice to customers via mass text message that water would be turned on from 2000-2015 and 2100-2115. Phil believes Brenda, Pepper Hills MHP Tenant Relations, has all cell phone numbers. As far as Phil is aware, all tenants received the paper Tier 1 and the text message. There are 106 tenants total. Four of those 106 units are not occupied but notices were still taped to the door. DEP reviewed the PN that was provided, and none of the blanks were filled in with the appropriate information.

12/29 Department was onsite to evaluate the situation.

The Department has received four complaints in the last week. Phil has not received any water quality complaints since ESC took over. Brian indicated some people approached him about pressure at the top of the hill. He adjusted pressure and had no further complaints. No one mentioned to Brian this week that they were experiencing discoloration. ESC has received no complaints. Tenants typically call Brenda Berry, who is the park liaison, and she would relay the message to Phil. Phil called Brenda while we were onsite. Brenda indicated she does not live here at the park. She indicated she received no complaints this week in regards to discoloration. They had about 15 complaints called in, and about 30 texted complaints about the water outage. Brenda said, speaking in general, that the complainants told her they didn't have water, some indicating that their meters were cracked. Brenda indicated on the phone that she relays any calls to Phil and/or Brian and sometimes Vince.

Vince Cianfichi, owner of the company Valex Property Management, installed the Metron meters on behalf of the MHP owner. NSF-certification was found on the meter itself and the brass fittings during the inspection. Vince recommends NOT installing heat tape inside the insulation, or the meter and/or styrofoam boot might melt. Vince indicated that some of the installed meters are snapping at the top. There was a meter removed from the distribution and available to inspect at the office that is snapped near the top above the styrofoam boot. Vince has worked with Metron meters, but not this type of meter. Vince is not aware of any issues with these types of meters. Vince indicated he bled/purged 90% of the water lines prior to meter installation or flushed the cold interior water lines after installation in order to remove any sediment that was disturbed during meter installation work. Some homeowners wouldn't allow access to the interior plumbing in order to bleed the lines. Vince also indicated there were 4 or 5 homes where the tee coming from the hot water heater was inspected, broken and replaced. Vince indicated this was done at no expense to the homeowners. Some homeowners removed the meters on their own, and some were removed by Vince when it was noticed that they were broken/leaking. There are tenant agreements that indicate the exposed portion of the water line under the home is the homeowner's responsibility. These agreements were provided to the homeowners within a week of the MHP being purchased. Homeowners were given 60 days to sign the agreement. Brian Helfrich lives at the MHP and received his notice about 4 days prior to MHP purchase.

One complainant told Casey that their meter was removed. Phil requested the complainant information from DEP in order to install a new meter and ensure the heat tape is properly installed. The Department will have to keep complainant information anonymous until we can confirm with the homeowner that it is acceptable to provide that information in order for repairs to be made.

Phil and Vince indicated there is currently water pressure in the mains, and the tanks are gaining. The tank level is 2.7' now. It was 2.4' about an hour ago. The tank on the top of the system has 60 psi, which is normal. There were 29 reported problems in total where the meter was removed, the line replaced, or the line was frozen. Four of those 29 leaks have not been repaired yet. The plan is to repair them today.

Manganese and iron samples are requested to be collected next week (raw, EP, and representative distribution system location) to determine and confirm water quality. Ryan indicated during the inspection that he was on the phone ordering new greensand media. If the media used is not what is permitted, a permit amendment may be required. Please contact DEP with media specifications and NSF-certification prior to installation.

Field Order 23-41-802-001 was directed to Tia Martini-Spangenberg, Pepper Hills' Responsible Official. The Department served the Field Order to Philip Chiavacci, Property Manager, who signed the form.

The Tier 1 public notice that was provided last night had none of the blanks filled. A completed Tier 1 is to be issued to the park residents no later than 24 hours from the field order issuance (by noon on 12/30/22). Also, an alternate source of water is to be provided to customers no later than 24 hours from the field order issuance (by noon on 12/30/22). Please send a completed copy of the Tier 1 and documentation regarding alternate water to Sasha Minium, Environmental Group Manager, at sminium@pa.gov.

Any questions please contact Valerie Elsasser at velsasser@pa.gov or 570.916.8472.

Signatures

Received by(Print Name): PHILIP CHIAVACCI	Unable To Receive Signature: INSPECTION FINALIZED OFFSITE
Investigator (Print Name): VALERIE R ELSASSER	