John Bel Edwards
GOVERNOR

Rebekah E. Gee MD, MPH
SECRETARY

State of Louisiana

Department of Health

Office of Public Health

CERTIFIED MAIL: 7016 3560 0000 0462 1568

June 4, 2018

Mayor Lee Posey
NATCHITOCHES WATER SYSTEM
P.O. Box 37
Natchitoches, LA 71458

Re: Class I Sanitary Survey
NATCHITOCHES WATER SYSTEM Public Water System
PWS ID LA1069007
NATCHITOCHES Parish

Mayor Posey:

The Department of Health would like to thank you and the site visit participants for the courtesy and assistance provided during the May 29, 2018 sanitary survey inspection of the public water supply system for NATCHITOCHES WATER SYSTEM (System). The intent of these surveys are to evaluate the System's ability to produce and distribute safe drinking water in accordance with Safe Drinking Water Act (SDWA) requirements, including the SDWA's Ground Water Rule (GWR), 40 C.F.R. §§ 141.400-405 and Surface Water Treatment Rule (SWTR), 40 C.F.R. §§ 141.700-723 and Title 51 of the Louisiana Administrative Code. This letter confirms and supplements items noted during the inspection.

Parties Present

Name	Organization
Autumn Permenter	LDH-OPH Engineering District 4
Matt Anderson	Natchitoches Water System
Jennifer Kihlken	LDH-OPH/Engineering Services
Danny Mortimer	OPH Region VII Engineering
Bronnie Odom	City Of Natchitoches
James Soileau	LDH-OPH Region 8

NOTICE OF VIOLATIONS

By this notice LDH calls to your immediate attention the following deficiencies observed during our inspection of your system's facilities and records. Under the GWR and SWTR, significant deficiencies are defined to include a defect in design, operation, or maintenance, or a failure or malfunction of the sources, treatment, storage or distribution system that LDH determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers. See 40 C.F.R §§ 141.403(a)(4)(GWR) and 141.723(b) (SWTR).

Significant Deficiencies

FACILITY	CATEGORY	FINDINGS
Management	Operator Compliance with State Requirements	The water system is not under the control and supervision of a duly certified operator for periods of time. The water system, per population and system design at the time of the survey, must be placed under the supervision and control of a certified operator holding at least level IV certifications in the categories of Water Treatment. At all times, when the surface water plant operates multiple shifts, a certified operator is required to be present on each shift.
FACILITY	CATEGORY	FINDINGS
GR001 - GST #1, CLEAR WELL	Finished Water Storage	The level gauge is no longer functional or in use. As result, there are holes allowing the possible entrance of a contaminant into the potable water supply. The holes must be sealed to prevent the entrance of birds, insects, dust or other contaminating material.
FACILITY	CATEGORY	FINDINGS
EL002 - EST #2, PILGRIM'S PRIDE	Finished Water Storage	The protective fencing surrounding the well and pressure tanks was compromised in order to perform maintenance and repair work. The sections of the fence that are intact have significant gaps near the ground that leave the water system facilities exposed. A continuous fence, capable of being locked, must be constructed to prevent trespassing, vandalism, and sabotage of the water system facilities. Please submit labeled photographic documentation of completed repairs.
FACILITY	CATEGORY	FINDINGS
EL006 - EST #6, GRAND ECORE	Finished Water Storage	The protective fencing surrounding the well and pressure tanks was compromised in order to perform maintenance and repair work. The sections of the fence that are intact have significant gaps near the ground that leave the water system facilities exposed. Furthermore, there are large breaks in sections of the fence from a fallen pole and excess vegetation growth. A continuous fence, capable of being locked, must be constructed to prevent trespassing, vandalism, and sabotage of the water system facilities. Please submit labeled photographic documentation of completed repairs.
FACILITY	CATEGORY	FINDINGS
EL007 - EST #7, GOLD STREET	Finished Water Storage	The protective fencing surrounding the well and pressure tanks was compromised in order to perform maintenance and repair work. The sections of the fence that are intact have significant gaps near the ground that leave the water system facilities exposed. Furthermore, there are sections of the fence with broken barbed wire. A continuous fence, capable of being locked, must be constructed to prevent trespassing, vandalism, and sabotage of the water system facilities. Please submit labeled photographic documentation of completed repairs.

Deficiencies

FACILITY	CATEGORY	FINDINGS
EL008 - EST #8, I-49	Finished Water Storage	From review the finished water storage facilities (elevated towers, ground storage tanks, and hydropneumatic tanks) should be inspected. Finished water storage facilities are generally maintained and inspected on a routine basis. An inspection period of 3 to 5 years is recommended. The water system has no recent inspections to support the overall health of the finished water storages' interior or exterior conditions. In addition to exterior cleaning and/or painting, the interior surfaces of finished water storage facilities could benefit from an inspection.
FACILITY	CATEGORY	FINDINGS
GR002 - GST #2, BYPASS	Finished Water Storage	Piping within the pipe gallery is showing signs of rust, corrosion and flaking paint. The piping must be cleaned, treated and painted to resist further corrosion.
FACILITY	CATEGORY	FINDINGS
GR002 - GST #2, BYPASS	Finished Water Storage	The area around the sample tap at the storage tank is excessively wet and holding water in a ditched area. This area must be well drained to facilitate the rapid removal of water within a 50' radius of the storage tank. The ponding water presents a potential source of contamination and may potentially compromise the integrity of the structure.
FACILITY	CATEGORY	FINDINGS
GR002 - GST #2, BYPASS	Finished Water Storage	The Ground Storage Tank did not have an overflow pipe. All water storage structures shall be provided with an overflow which is brought down to an elevation between 12 and 24 inches above the ground surface, and discharges over a drainage inlet structure or a splash plate.
FACILITY	CATEGORY	FINDINGS
EL003 - EST #3, MLK	Finished Water Storage	The overflow for the elevated storage tank discharges at the top of the tank. An overflow pipe should be installed to extend the overflow discharge within 12-24 inches over a splash pad or drainage inlet structure.
FACILITY	CATEGORY	FINDINGS
EL005 - EST #5, HIGHWAY 3191	Finished Water Storage	The overflow for the elevated storage tank does not discharge between 12 and 24 inches over a splash plate or drainage inlet structure. All overflow pipes shall be located so that any discharge is visible.
FACILITY	CATEGORY	FINDINGS
EL004 - EST #4, OLD HWY 6	Finished Water Storage	The overflow for the elevated storage tank does not discharge between 12 and 24 inches over a splash plate or drainage inlet structure. All overflow pipes shall be located so that any discharge is visible.
FACILITY	CATEGORY	FINDINGS
GR001 - GST #1, CLEAR WELL	Finished Water Storage	The overflow for the elevated storage tank does not discharge over a splash plate or drainage inlet structure. The discharge must discharge over a splash plate or drainage inlet structure to prevent erosion around the foundation of the tower that could comprise the structural integrity of the tower.
FACILITY	CATEGORY	FINDINGS
EL002 - EST #2, PILGRIM'S PRIDE	Finished Water Storage	The overflow for the elevated storage tank does not discharge over a splash plate or drainage inlet structure. The discharge must discharge over a splash plate or drainage inlet structure to prevent erosion around the foundation of the tower that could comprise the structural integrity

		of the tower.
FACILITY	CATEGORY	FINDINGS
GR001 - GST #1, CLEAR WELL	Finished Water Storage	The overflow pipe must be screened with 24 mesh non-corrodible screen and installed to provide protection at all times.
FACILITY	CATEGORY	FINDINGS
TP001 - SURFACE WATER TREATMENT PLANT	Treatment	The chemical feed tank for the 907 alum is not labeled. The chemical feed tank must be labeled. Label the chemical feed tank with the name of the chemical being injected for treatment.

The significant deficiencies listed in the above table titled 'Significant Deficiencies' must be corrected and a written response submitted to the department within 90 days of the receipt of this letter. The response must summarize what actions you have taken to correct these items, and include all required documentation to support those actions. If additional time is required to correct these deficiencies, then the written response must also contain a request with specific dates when the deficiencies will be corrected.

The above noted deficiencies must be corrected to avoid possible enforcement action by the U.S. EPA Region 6 and/or the LDH-OPH Enforcement Unit. Interim corrective actions shall be performed as necessary to prevent health hazards and nuisances. As stated above, written confirmation must be provided within 90 days of receipt of this letter of your actions with regard to this matter. Be advised that the GWR requires you to notify LDH within 30 days of completion of the corrective action.

Recommendations

The following observations made at the time of the inspection have the potential to result in deficiencies in the near future. LDH strongly recommends that the following recommendations be addressed to maintain compliance with primary drinking water regulations.

No observations were recorded in this category.

Written Response Required

Send written responses and confirmation regarding violations and recommendations to the office that conducted this survey at the following address:

LDH/OPH Engineering Services – Northwest Region VII
Attn: Autumn Permenter, PE
1525 Fairfield Ave. Room 569
Shreveport, Louisiana 71101

The following compliance history is provided for your information

Bacteriological Sampling History

Positive bacteriological sampling history for the past year

Sample ID	Type	Date	Comment	Chlorine Residual	
				Free	Total
S1802961-003	Repeat	5/23/2018			1.300
S1802784-013	Routine	5/21/2018			1.500
S1801777-015	Routine	4/2/2018			3.900
S1707867-002	Routine	10/2/2017			2.600
S1706910-004	Routine	8/14/2017			1.000
S1706566-007	Routine	8/1/2017			2.100
S1706387-001	Repeat	7/20/2017			2.900
S1706387-002	Repeat	7/20/2017			2.800
S1706387-003	Repeat	7/20/2017			2.800
S1706238-010	Routine	7/17/2017			2.700
S1705944-007	Routine	7/10/2017			2.600
S1705846-002	Repeat	6/21/2017			2.500
S1705773-006	Routine	6/19/2017			3.200
S1705773-008	Routine	6/19/2017			3.000
S1705773-014	Routine	6/19/2017			1.380
S1705328-001	Routine	6/12/2017			2.400
S1705328-010	Routine	6/12/2017			2.500

Violation History

Monitoring Violations during the past year

No monitoring violations were reported in the past year.

Maximum Contaminant Level (MCL) Violations during the past year

No maximum contaminant level violations were reported in the past year.

Other Violations during the past year

Violation Number	Violation Date	Violation Type	Compliance Period
7008245	08/11/2017	INADEQUATE MIN CHLORINE RESIDUAL(GW&SW)	08/01/2017 - 08/31/2017
7008244	07/11/2017	INADEQUATE MIN CHLORINE RESIDUAL(GW&SW)	07/01/2017 - 07/31/2017

Your cooperation and prompt response is greatly appreciated. If you have any questions, or if we can be of further assistance, please contact me at (318) 676-7477.

Respectfully,



Autumn Permenter, P.E.
District Engineer – District IV
LDH/OPH - Engineering Services

cc: Amanda Laughlin, P. E., Chief Engineer, LDH-OPH-Engineering