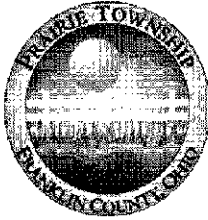


FILE



Prairie Township Board of Trustees

23 Maple Dr.
Columbus, Ohio 43228

Telephone (614) 878-3317

Fax (614) 878-0566

Trustees
Steve Kennedy
Nicole Schlosser
Doug Stormont

Dan McCardle
Fiscal Officer

Tracy Hatmaker
Administrator

July 20, 2008

Public Utilities Commission of Ohio
Administration/Docketing
180 East Broad Street, 13th Floor
Columbus, Oh 43215-3793

Re: Case # 07-1112-WS-AIR
Ohio American Water Company

PUCO

2008 JUL 23 AM 11:48

RECEIVED - DOCKETING DIV

Response to Tom Schwing Supplemental Testimony June 27, 2008:

Question #7

ARE THERE CLARIFICATIONS TO THE STAFF REPORT THAT SHOULD BE MADE WITH RESPECT TO THE BLENDING CAPABILITY OF THE LAKE DARBY TREATMENT PLANT?

Tom Schwing answer:

Yes, the Staff Report (pages 62-63) referenced the variability of the finished water hardness, particularly as sampled, measured and reported by a Prairie Township trustee. As noted in the Staff Report there were major changes in the normal Lake Darby water treatment plant ("Lake Darby WTP") operations associated with the use of small temporary water storage tanks while the system's elevated water storage tower was being painted. In response to the Prairie Township trustee's reported values, Ohio American met with Staff and the trustee to discuss the trustee's reported water hardness values. Ohio American committed to investigate and determine the apparent variability in water hardness concentrations. In response to that meeting and through Ohio American's subsequent investigation and examination, multiple causes were identified which could have contributed to the apparent variability of the water hardness. A report of Ohio American's investigation was filed with the Commission (See filing entitled Ohio American Water Company Response to Documents Filed by Steve Kennedy, Prairie Township Trustee filed February 13, 2008). Based on its findings, Ohio American immediately modified the original 1972 water blend pipe line design—from a single large blend piping system to two (2) smaller blend piping systems with each smaller blend pipe line coupled to a specific water softener. This action provides more precise control of water blending resulting in more stable finished water hardness. Once the piping modifications had been completed and adjusted to in-field operating conditions, the finished water hardness stabilized. As Ohio American endeavored to reduce the variability of the finished water hardness, the mechanical process limitations of the water

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician TM Date Processed 7/23/2008

softening treatment plant originally constructed more than 36 years ago manifested themselves. In response, Ohio American investigated the problem, developed a solution to remove the limiting performance factors and improved the performance and reliability of the Lake Darby WTP to produce stable finished water hardness. This demonstrates an ongoing willingness to listen to its customers' concerns and address problems in a systematic and responsive manner.

Steve Kennedy response to Mr. Schwing answer of question #7

I agree with Mr. Schwing's testimony there was an issue with the original 1972 blend pipe line design that cause variability with the hardness readings. I also believe that the repair they made helped the problem to some extent. The repair by O.A.W. shows there has been an issue with the water blending for the pasted 35 years and the company is just now trying to address this issue. What Mr. Schwing's testimony does not address is how hardness readings could vary so much within the system. Random samples taken at the firehouse on Hubbard Road during this period (Nov. 07 thru Feb. 08) showed the company out of stipulated range 10 days while the company testing showed within range every day.

Question #8

HAVE THERE BEEN ANY WATER QUALITY OR SERVICE ISSUES THAT HAVE OCCURRED IN THE LAKE DARBY SERVICE AREA SINCE NOVEMBER 2007 THAT SHOULD BE EXPLAINED?

Tom Schwing answer:

Yes. On February 21, 2008 the bulk salt supply in Brine Maker #2 at the Lake Darby WTP was depleted. Without the bulk salt supply, the brine solution required to regenerate the water softeners used to soften the water could not be generated. As a result, the water softeners were not regenerated and the Lake Darby WTP's finished water hardness spiked above 150 mg/L. The depletion of the bulk salt supply was caused by operator error. The operator failed to follow procedures for checking the bulk salt tank inventory. The operator's failure to monitor the chemical salt inventory was compounded by a spill of salt brine solution to the sanitary sewer caused by the brine day tank's level monitoring system failure. This spill caused a higher usage of bulk salt supply. Salt supply was delivered by 1:00 a.m. on February 22, the operator worked through the night regenerating the softeners, and the plant began producing softened water. By noon on February 22, all water distribution samples were measured with an acceptable hardness value under 150 mg/L. As a result of the incident. Job Aids to assist operators on the proper measurement of salt inventory were developed and implemented. In addition, discussions with operating personnel were held to reinforce the requirements of following operating procedures. In summary, a human error occurred. Ohio American investigated and identified the root causes that contributed to the error; expedited work to correct the problem; and finally, developed and implemented procedures and systems to correct the root causes of the error.

Steve Kennedy response to Mr. Schwing answer of question #8

What Mr. Schwing did not address in his summary was why the plant operator waited so long to inform plant management that he let the system run out of salt. In previous documents it is stated the company performs their daily hardness test about 7:30 AM everyday. The random tester had to inquire about the high hardness reading at 3:00 PM before this was reported to plant management and then reported to P.U.C.O. By waiting over 7 hours gives the appearance that the plant operator was trying to hide the oversight of running out of salt from plant management.

Question #10

ARE THERE ANY RECOMMENDATIONS YOU HAVE WITH RESPECT TO THE NUMERIC SOFTNESS VALUES THAT WOULD SATISFY THE LAKE DARBY CUSTOMERS?

Tom Schwing answer:

Yes. The Staff Report recommended that the finished water hardness be in the numeric range fix)m 120 mg/L to 150 mg/L hardness. The Lake Darby customers and particularly Steve Kennedy, the Lake Darby Township Trustee, have consistently stated that, if possible, a lower hardness level is desirable. Customers' concerns have focused on exceeding the upper hardness level of 150 mg/L, not the lower hardness level of 120 mg/L. In order to provide more operational flexibility, the lower hardness concentration level of 120 mg/L should be removed. While delivering a finished water with a lower hardness may result in more aggressive water from time to time, the company can monitor the water so that it may take control actions to counter any change in the water chemistry.


Steve Kennedy response to Mr. Schwing answer of question #10

I also would like to see the lower hardness level of 120mg/l be removed from the stipulations. I also would like to see the higher number of 150mg/l lowered also. I believe that if the company was able to maintain hardness levels in a range around 100mg/l the residents that have home softening units would feel comfortable turning their units off.

In closing I would like to point out that all these hardness issues have come to the foreground because of random hardness testing by a third party. I believe the next set of stipulations will need to address the accountability of hardness testing. O.A.W. employees perform the current approved testing at O.A.W. plant, only when the plant is staffed, and then the sample is checked for compliance by an O.A.W. lab. This gives very little accountability to the hardness testing especially when it still seems the company is still having issues staying within the current stipulations. As recently as July 1 2008 1:15 PM the random testing confirmed lab hardness reading was 35.6mg/l and on July 13 2008 at 9:03 PM the lab confirmed reading was 232 mg/l. O.A.W. should be fined under the current stipulation for the month of July 2008. Independent lab results enclosed.

Sincerely,

Steve Kennedy


Prairie Township Trustee

Certificate of Analysis - Fax Copy

MAEI ENVIRONMENTAL SERVICES
P. O. Box 1440
Dublin, Ohio 43017
(614) 873-4854

Page: 1

Date: 07/09/08

STEVE'S COUNTRY DRIVE THRU
STEVE KENNEDY
6611 WEST BROAD STREET

GALLOWAY OH 43119

Client No: 0000005847
AR Sheet No: 0114276-AR
Chemical Certification 4039
Bacterial Certification 877
PWS ID No:
STU ID No:
PO No:

Dear Client:

Along with your results listed below we would like to thank you for
allowing MASI to assist you with your environmental testing requirements.

Account Name: STEVE'S COUNTRY DRIVE THRU	Private
Sampler Name: STEVE KENNEDY	County: FRANKLIN
Sample Date: 07/01/08	Chlorinated:
Sample Time: 13:15	Repeat No:
Sample Type: POTABLE	Cl2 Total:
Sample Monitoring Point:	Cl2 Free:
Sample Tap: SEE BELOW	Cl2 Combined:
Sample Class:	
Sample Address: KITCHEN SINK FIREHOUSE 451 HUBBARD RD GALLOWAY	
Sample ID: OHIO 43119	

Test Requested	Lab	Method	Analyst	Date
Test Result	Number	Number	Number	Analyzed
Hardness, total	17125	2340-B	1147	07/07/08
35.6 mg/l				

Certificate of Analysis - Fax Copy

MASI ENVIRONMENTAL SERVICES

P. O. Box 1440
Dublin, Ohio 43017
(614) 873-4654

Page: 1
Date: 07/22/08

STEVE'S COUNTRY DRIVE THRU
STEVE KENNEDY
6611 WEST BROAD STREET

GALLOWAY OH 43119

Client No: 0000005847
AR Sheet No: 0114277-AR
Chemical Certification 4039
Bacterial Certification 877
PWS ID No:
STU ID No:
PO No:

Dear Client:

Along with your results listed below we would like to thank you for allowing MASI to assist you with your environmental testing requirements.

Account Name: STEVE'S COUNTRY DRIVE THRU	Private
Sampler Name: STEVE KENNEDY	County: FRANKLIN
Sample Date: 07/13/08	Chlorinated:
Sample Time: 21:03	Repeat No:
Sample Type: POTABLE	Cl2 Total:
Sample Monitoring Point:	Cl2 Free:
Sample Tap: SEE BELOW	Cl2 Combined:
Sample Class:	
Sample Address: KITCHEN SINK 451 HUBBARD RD FIREHOUSE	
Sample ID:	

Test Requested	Lab Number	Method Number	Analyst Number	Date Analyzed
Hardness, total 232 mg/l	22790	2340-B	1147	07/17/08