



REGION 7

LENEXA, KS 66219

January 20, 2026

SERVICE VIA ELECTRONIC MAIL
RECEIPT CONFIRMATION REQUESTED

Honorable Bob Frey, Mayor
City of Leon
104 West 1st Street
Leon, Iowa 50144
leonmayorbob@gmail.com

RE: City of Leon Public Water System
PWS ID: IA2742076

NOTICE OF NONCOMPLIANCE

Dear Honorable Mayor Frey,

On August 19, 2025, representatives of the U.S. Environmental Protection Agency Region 7 performed an inspection of the City of Leon's public water system (PWS or System) under the authority of Section 1445 of the Safe Drinking Water Act. A copy of the inspection report was sent to the System on October 6, 2025.

The System's September 17, 2025, and November 17, 2025, responses to a Notice of Preliminary Findings addressed several findings identified during the inspection and described planned actions to address additional findings. After reviewing the inspection report and the System's response to the NOPF, the EPA determined that the following violations, issues of concern, and recommendations still need to be addressed.

Violation 1: Abandoned Well Plugging Schedule

Requirement – IAC Chapter 567 - 39.3(455B) requires that "All classes of wells that are abandoned must be properly plugged within 90 days of the date of abandonment."

Violation – Jordan Well #4, abandoned in 2008, is not properly plugged.

The System stated that it will work with the Iowa DNR, Iowa Rural Water Association, and a certified contractor to investigate properly plugging the Jordan well; however, a plan has not been submitted to the EPA and the well has not been plugged to date.

Corrective Action: Submit to the EPA the expected timeframe or expected completion date that the well will be properly plugged.

Violation 2: Treatment Techniques for Acrylamide and Epichlorohydrin

Requirement – 40 CFR 141.111 requires that each public water system must certify annually, in writing to the State that when acrylamide and epichlorohydrin are used in drinking water systems, that the combination of dose and monomer level does not exceed the levels specified as follows:

Acrylamide = 0.05% dosed at 1 ppm (or equivalent).

Epichlorohydrin = 0.01% dosed at 20 ppm (or equivalent).

Violation – The System did not complete its 2024 or 2025 annual certifications for acrylamide and epichlorohydrin dosage for coagulants, as required by 40 CFR 141.111.

The System stated that it would contact its chemical supplier, Chem-Sult, to obtain the acrylamide certification; however, the System has not provided the EPA with information to demonstrate the certification has been completed.

Corrective Action: Submit to the EPA documentation that the 2025 annual certification for acrylamide and epichlorohydrin dosage for coagulants is completed.

Issues of Concern

1. The System does not track or regularly inspect high hazard cross connections. High hazard cross-connections can pose a serious potential risk of contaminating water supplied to consumers, and the risk is significantly increased if connections are not identified, tracked, and inspected. The System stated it will work with Iowa Rural Water Association to implement a cross-connection control plan; however, the System has not provided the EPA with information to demonstrate this has been completed.

Corrective Action: Submit to the EPA the expected timeframe that high hazard cross connections will be tracked and inspected.

2. The 300,000-gallon and 100,000-gallon above-ground storage tanks have not been recently inspected. The System has stated that it will have the storage tanks inspected; however, the System has not provided the EPA with information to demonstrate this has been completed.

Corrective Action: Submit to the EPA the expected completion date that the ground storage tanks will be inspected.

3. The 300,000-gallon storage tank's clearwell hatch does not have a water-tight seal. The System stated it will install a water-tight seal on the hatch; however, the System has not provided the EPA with information to demonstrate this has been completed.

Corrective Action: Submit to the EPA the expected completion date that the 300,000-gallon storage tank's clearwell hatch will be installed with a water-tight seal.

4. The bulk chemical fill station does not have adequate protections or procedures to reduce risk of mishandling. The System stated it will coordinate with their chemical supplier to implement methods that will ensure proper handling, including prevention of introduction of chemicals in incorrect fill lines. The system has not provided the EPA with specific details on how the mishandling risk will be addressed.

Corrective Action: Submit to the EPA a plan on how risk of mishandling at the bulk fill station will be mitigated.

Recommendations

1. The System does not have a valve exercising program. A developed valve exercise program can help ensure the System can isolate portions of the distribution system to reduce the number of customers affected when maintenance of the distribution system occurs. The System should proceed with plans to create a written plan for valve exercising.

2. The System does not have a written standard operating procedure for distribution system flushing. Flushing programs increase capabilities to flush at appropriate locations and intervals, improving the ability to manage water age, remove sediment, and promote appropriate residual disinfectant levels throughout the distribution system. The System should proceed with plans to create a written plan for their distribution system flushing program.

Within 30 days of receipt of this Notice of Noncompliance, please submit to the EPA, documentation of actions taken to address the violations, issues of concern, and recommendations identified above.

The EPA reserves all rights it may have to take appropriate enforcement action, including penalties, to address any of its findings. Submit your response and please direct any questions about the information in this letter to Connor Finn, of my staff, at (913) 551-7244 or finn.connor@epa.gov. Thank you for your attention to this matter.

Sincerely,

VEDA HAKAMI
STOY

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Date: 2026.01.21
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