



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

March 15, 2007

Michael E. Moore, Superintendent
Russia Local Schools
100 School Street
PO Box 8
Russia, Ohio 45363

RE: Shelby County
Russia Local Schools
Nontransient noncommunity Water System
PWSID#: 7534112

Certified Mail 70011940000069302736

Dear Mr. Moore:

The public water system at Russia Local Schools violated Ohio's safe drinking water laws and will most likely exceed the arsenic maximum contaminant level (MCL) within the year. Specifically, Russia Local Schools exceeded the monthly MCL for total coliform bacteria during the October through December 2003 monitoring period, failed to monitor with 5 repeat samples within the required time period after exceeding the MCL for total coliform, failed to monitor for inorganic chemicals in the 2004 monitoring period, failed to monitor for lead and copper in the 2005 monitoring period, and failed to public notice for the total coliform MCL violation. In accordance with Ohio Administrative Code (OAC) Rules 3745-81-11(B) and 3745-81-23(H)(2), the running annual average MCL for arsenic is 10 µg/L. Currently, your running annual average is 7.32 µg/L.

Owners or operators of public water systems that fail to comply with Ohio's safe drinking water laws and regulations are subject to civil penalties of up to \$25,000 per day per violation under Ohio Revised Code Section 6109.33.

The Ohio Environmental Protection Agency is aware Russia Local Schools has been proactive in seeking a resolution of this probable violation. To address your past drinking water violations and probable arsenic MCL violation and to prevent possible legal action and civil penalties:

1. By April 14, 2007, post public notice for past violation for no less than seven (7) days in accordance with OAC Rule 3745-81-32. Send the public notices and verification forms to Ohio Environmental Protection Agency, Southwest District Office, Division of Drinking and Ground Waters, Attn: John McDaniel, 401 East Fifth Street, Dayton, Ohio, 45402.
2. Comply with the MCL and monitoring requirements for total coliform bacteria, in accordance with OAC Rules 3745-81-14 and 3745-81-21 respectively; and collect lead and copper samples in accordance with the 2007 distribution schedule and OAC Rule 3745-81-86(D)(4).
3. Monitor for arsenic with one sample per calendar quarter in accordance with OAC Rule 3745-81-23(E)(2)(a). Comply with the monitoring and reporting requirements in accordance with the 2007 chemical monitoring schedule.
4. By May 31, 2007 submit detail plans for a chlorination system in accordance with OAC Chapter 3745-91, OAC Rule 3745-81-19(B)(7) and your approved point-of-use demonstration study protocol.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

5. By September 30, 2007 submit a report of the demonstration study for approval that demonstrates equivalent health protection to that provided by central water treatment to Ohio EPA, Central Office, Division of Drinking and Ground Waters, Lazarus Government Center, 50 West Town Street, Suite 700, P.O. Box 1049, Columbus, Ohio 43216-1049 Attn: Maria Lucente for approval.
6. By October 31, 2007, submit detail plans to address arsenic in the drinking water in accordance with OAC Chapter 3745-91 and OAC Rule 3745-81-19 to Ohio EPA.
7. Within thirty (30) days of notification, address any comments or deficiencies noted by Ohio EPA on any plan or other documentation submitted by Russia Local Schools.
8. Within thirty (30) days of Director's plan approval, commence construction in accordance with the plan.
9. Within sixty (60) days of Director's plan approval, complete construction and initiate operation in accordance with the Director's plan approval.
10. Following installation of point-of-use treatment devices, monitor for arsenic in accordance with the approved detail plans and OAC Rule 3745-81-19(B)(2).
11. No later than twelve (12) months after completion of construction, Russia Local Schools will be in compliance with the running annual average MCL for arsenic in accordance with OAC Rules 3745-81-11(B) and 3745-81-23(E) and (H).
12. In the event that Russia Local Schools exceeds the arsenic MCL, public notice will be issued in accordance with OAC Rule 3745-81-32.
13. In the event that Russia Local Schools exceeds the arsenic MCL prior to the installation of an approved treatment system, Russia Local Schools will provide an alternative source of water for human consumption, including water used for beverage preparation, within thirty (30) days of the exceedance. This provision will then remain in effect until Russia Local Schools completes the installation of an approved treatment system.

Sincerely,



Michael G. Baker, Chief
Division of Drinking and Ground Waters

If it is your intent to comply with the safe drinking water laws and regulations in the manner specified, please sign this document and return it to the attention of Marco Deshaies at Ohio EPA, Division of Drinking and Ground Waters, Lazarus Government Center, 50 West Town Street, Suite 700, P.O. Box 1049, Columbus, Ohio 43216-1049, within fourteen (14) days. Your signature is not considered an admission of guilt, only an indication of your intention to address the violations noted. Ohio EPA reserves its right to seek civil penalties pursuant to Revised Code 6109.33 for the violations described in this letter. If you have any questions concerning this letter, please call Marco Deshaies at (614) 644-2761.



Michael Moore
Superintendent, Russia Local Schools

4-2-07

Date