



**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Nally, **Director**

April 6, 2012

Geneva Hills Group, Inc.  
1380 Blue Valley Road  
Lancaster, Ohio 43130  
Attn: Geoffrey W. Burns

CERTIFIED MAIL  
9171082133393715014930

RE: Geneva Hills Lodge (PWS I.D. #OH2332312)  
Geneva Hills Frontier Lodge (PWS I.D. #OH2332112)  
Geneva Hills Pool (PWS I.D. #OH2344812)  
Geneva Hills Residence (PWS I.D. #OH2332212)  
Fairfield County  
Transient non-community public water systems  
NPDES #4PR00094\*CD

Dear Mr. Burns:

On November 21, 2011, Ohio EPA issued Director's Final Findings and Orders (2011 Orders) to Geneva Hills Group, Inc., for the Lodge, Frontier Lodge, Pool and Residence public water systems and the wastewater system. These Orders, signed by you as the authorized representative of Geneva Hills Group, Inc., were mailed to you on November 22, 2011. Additionally, on February 13, 2012, Ohio EPA issued Unilateral Director's Final Findings and Orders (2012 Orders) to Geneva Hills Group, Inc., conditioning the licenses to operate for all four Geneva Hills public water systems. These Orders were mailed to you on February 14, 2012. Copies of each are attached.

Geneva Hills was required to do the following and failed to do so, in violation of Ohio Revised Code Section 6109.31:

1. In violation of the 2011 Orders, Respondent failed to monitor for total coliform bacteria during the monitoring period of October 1 to December 31, 2011;
2. In violation of the 2012 Orders, Respondent failed to submit public notification and verification forms for the October 1 to December 31, 2011 total coliform monitoring violation;
3. In violation of both the 2011 and 2012 Orders, Respondent failed to contract with a certified laboratory to collect and analyze required PWS samples for twelve (12) months and to provide documentation of the contract to Ohio EPA; and,
4. In violation of the 2011 Orders, Respondent has failed to submit a general plan, in accordance with OAC Chapter 3745-91.

Please be advised that due to these additional violations, Ohio EPA may consider additional enforcement action and penalties to ensure compliance.

Please note that any violations of Orders No. 8 through 11 from the 2011 Orders will be addressed by the Ohio EPA Division of Surface Water.

In order to resolve this matter without additional enforcement action or penalties, the following actions must be completed and reported to my attention **no later than April 25, 2012.**

1. Submit public notification and verification forms for the October 1 to December 31, 2011 total coliform monitoring violation;
2. Contract with a certified laboratory to collect and analyze required PWS samples for twelve (12) months and submit a copy of the signed laboratory contract; and,
3. Submit a general plan, in accordance with requirements in OAC Chapter 3745-91. This general plan should include a description of measures to be taken to obtain an approvable source(s) of water for each of the four PWSs to ensure compliance with ORC Chapter 6109 and OAC rules adopted thereunder, as well as a detailed compliance schedule with applicable milestone dates of significant events that are necessary to attain compliance.

If you have any questions, you may contact me at 614-644-2759.

Sincerely,



Julie Spangler  
Enforcement Coordinator  
Ohio EPA – Division of Drinking and Ground Waters

ec: Holly Kaloz, Environmental Manager, DDAGW-CO  
Jose Quinones, Unit Supervisor, DDAGW-CDO  
Mark Boden, DDAGW-CDO  
Paul Vandermeer, DSW-CDO  
Kimberly Rhoads, Office of Legal Services

cc: Fairfield County Health Department