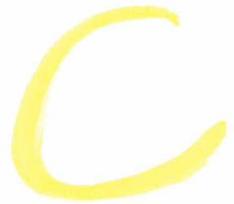




**Environmental  
Protection Agency**

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



August 30, 2012

RE: SUMMIT COUNTY  
OLD TRAIL SCHOOL  
PWS ID # OH7754712  
NON-TRANSIENT NON-COMMUNITY PWS

**NOTICE OF VIOLATION**

Mr. John Farber  
Old Trail School  
2315 Ira Road  
Bath, OH 44313

Dear Mr. Farber:

On August 6, 2012, a limited site scope visit was performed at the Old Trail School. The visit focused on reviewing the recordkeeping for the public water system. Below are the deficiencies noted during the visit. Please provide a written explanation within 30 days of the date of this letter detailing how these deficiencies are being addressed. I have enclosed a copy of the Ohio Administrative Code Rule 3745-7-9, which specifies the recordkeeping requirements and responsibilities of a certified operator.

**Deficiencies**

The logbook at the facility was a spiral bound notebook. OAC 3745-7-9(A)(1) states, "records shall be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within." A spiral notebook does not guarantee authenticity and accuracy. A hard bound book with consecutive page numbering is an example of a method that would meet this requirement. Please change your record keeping to a method that meets this requirement.

OAC 3745-7-9(A)(3)(f) requires the identification of the person making the entry. This information was lacking for the majority of the entries in the logbook. This information must be included every time an entry is made.

OAC 3745-7-9(A)(3)(c) and (e) require records to contain specific operation and maintenance activities, preventative maintenance activities and requests for repair of equipment that affect or have the potential to affect the quality or quantity of water conveyed or produced. It was unclear if this information was recorded within the logbooks. This information should be detailed and recorded on the dates performed.

OAC 3745-7-9(3)(d) requires the results of tests performed and samples taken be documented, unless they are documented on a laboratory sheet. The results of any samples pulled should also be maintained within the logbook (i.e. quarterly total coliform sample results).

**Recommendations**

Entries should be recorded in blue or black ink.

OLD TRAIL SCHOOL  
AUGUST 30, 2012  
PAGE 2

Overall, the records should not only be housed and maintained in such a manner as to be protected from weather damage and guarantee the authenticity and accuracy of the records contained within; but should be well organized and legible.

**General**

Records are required to be kept up to date, contain a minimum of the previous three months of data at all times, and be maintained for at least three years.

If you have any questions regarding this correspondence, please feel free to contact me at (330) 963-1248, or by e-mail at bob.henn@epa.state.oh.us.

Respectfully,



J. Robert Henn  
Environmental Specialist  
Division of Drinking and Ground Waters

LH/ams

Enclosures: Ohio Administrative Code 3745-7-9

cc: Summit County Health Department  
Paul Header, Operator of Record

ec: Stivo DiFranco, Supervisor, Ohio EPA, NEDO, DDAGW  
J. Robert Henn, Environmental Specialist, Ohio EPA, NEDO, DDAGW  
Andy Barienbrock, Supervisor, Ohio EPA, Central Office, DDAGW