Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

August 29, 2012

RE: GEAUGA COUNTY
WEST GEAUGA CAMPUS PWS
PWS ID # OH2843012
WESTWOOD ELEMENTARY SCHOOL
PWS ID # OH2839312
LINDSEY ELEMENTARY SCHOOL
PWS ID # OH2837412
NON-TRANSIENT NON-COMMUNITY PWS's

NOTICE OF VIOLATION

Mr. Jim Russo, Operations Manager
West Geauga Local Schools
8615 Cedar Road
Chesterland, OH 44026

Dear Mr. Russo:

On August 6, 2012, limited site scope visits (LSSV's) were performed at West Geauga Campus, Westwood Elementary School and Lindsey Elementary School. The visits focused on reviewing the recordkeeping for the public water systems. Below are the deficiencies noted during these visits. 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 all three facilities 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 recordkeeping 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 every time an entry is made.

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. The logbook did not contain information from the last three years.

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).

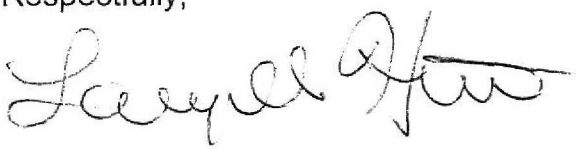
Recommendations

Entries should be recorded in blue or black ink, not pencil. Some of the entries in the logbook were written in pencil.

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.

If you have any questions regarding this correspondence, please feel free to contact me at (330) 963-1182, or by e-mail at laurel.hricik@epa.state.oh.us.

Respectfully,



Laurel Hricik
Environmental Specialist
Division of Drinking and Ground Waters

LH/ams

Enclosures: Ohio Administrative Code 3745-7-9

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

ec: Stivo DiFranco, Supervisor, Ohio EPA, NEDO, DDAGW
Laurel Hricik, Environmental Specialist, Ohio EPA, NEDO, DDAGW
Andy Barienbrock, Supervisor, Ohio EPA, Central Office, DDAGW