



State of Ohio Env

OH7400112

BETTSVILLE VILLAGE

12/18/2007

Northwe

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) :



Chris Korleski, Director

Re: Seneca County
Village of Bettsville
Community Water System
PWS ID # 7400112
STU ID # 7458085

December 18, 2007

Mr. Scott Vest, President, BPA
Village of Bettsville
P.O. Box 505
Bettsville, Ohio 44815

Dear Mr. Vest:

Subject: Notice of Violation for Failure to Respond to a Significant Deficiency

This letter is notification that the Village of Bettsville has not complied with requirements issued during this Agency's last survey performed on September 20, 2007, in violation of Ohio Administrative Code, Rule 3745-81-60. The Village of Bettsville was notified in correspondence dated October 18, 2007 of the requirement to respond in writing within 45 days, with a schedule for corrective actions to address the following:

1. OAC Rule 3745-7-09(A) specifies that the owner and operator of a public water system must maintain operation and maintenance records for the public water system. The records must include at a minimum, "(a) Identification of the public water system, sewerage system, or treatment works; (b) Date and times of arrival and departure for the operator of record and any other operator required by this chapter; (c) Specific operation and maintenance activities that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; (d) Results of tests performed and samples taken, unless documented on a laboratory sheet; (e) Performance of preventative maintenance and repairs or requests for repair of the equipment that affect or have the potential to affect the quality or quantity of sewage or water conveyed, effluent or water produced; and (f) Identification of the persons making entries.

Operation and maintenance records must be maintained by the Public Water System. OAC Rule 3745-7-09(A) states that, "Some formats in which the records can be maintained include...hard bound books with consecutive page numbering, time cards, separate operation and maintenance records, or well organized computer logs."

Partial logs were already being maintained. However, the logs must meet the above requirements.

2. OAC Rule 3745-81-24(C)(2) states that, each public water system required to monitor for Total Trihalomethanes and Haloacetic Acids, Five (TTHMs and HAA5) shall develop and implement a sample monitoring plan. The public water system shall maintain the plan and make it available for inspection by the director and the general public...The public water system shall modify the plan as required by the director. The plan must include at least the specific locations and schedules for collecting samples for TTHMs and HAA5. Failure to monitor according to the monitoring plan is a monitoring violation.

Submit a copy of the facility Disinfectants / Disinfection Byproducts Sample Monitoring Plan to Ohio EPA, along with the written response to this letter. A template for the Plan was provided at the time of the survey.

3. OAC Rule 3745-9-05(T) states that, "A vent shall be provided on all well caps... A well vent shall be self-draining, screened with a noncorroding mesh screen of fifteen to thirty mesh, pointed downward at or above the top of the casing or pitless unit. A vent shall terminate not less than twelve inches above ground surface..."

Wells 3 and 4 do not have appropriate vents in the seal/cap. Provide a vent on the wells that meet the specifications in OAC Rule 3745-9-05(T).

4. OAC Rule 3745-9-05(P) states that, "A well shall have a well cap or seal to prevent the entrance of water, dirt, animals, insects, or other foreign matter...Electrical conduit connections on the well cap or seal shall be threaded and sealed to prevent the entrance of insects and water."

The current cap on well #4 has an opening around the electrical connection. The wiring must enter the well through a threaded connection and be sealed to prevent the entrance of contaminants.

5. OAC Rule 3745-9-01(B) defines an abandoned well as, "a well, test hole, or dry hole whose use has been permanently discontinued." OAC Rule 3745-9-10(A) states that, "An abandoned well shall be sealed in accordance with this rule and rule 3745-9-07 of the Administrative Code."

In order for inactive Well #2 not to be considered a second source and treatment plant if it is used for the fire department to obtain water, it must be disconnected from the existing system. To protect the water source, an appropriate air gap device must be installed to fill the trucks from the well.

If the use of well #2 is permanently discontinued, the Village of Bettsville must abandon the well in accordance with the rules specified above. A copy of the well sealing report must be submitted to Ohio EPA, Northwest District Office within 30 days of the sealing in accordance with OAC Rule 3745-9-10(D).

6. The "Recommended Standards for Water Works," also known as "Ten States Standards" (TSS) Section 7.0.7 states that, "All water storage structures shall be provided with an overflow which is brought down to an elevation between 12 and 24 inches above the ground surface, and discharges over a drainage inlet structure or splash plate...All overflow pipes shall be located so that any discharge is visible." TSS 7.0.7 (c) states that, "The overflow for an elevated tank shall open downward and be screened with a four mesh, non corrodible screen."

The overflow on the elevated storage tank is not brought down to an elevation between 12 and 24 inches above the ground surface and a splash pad is not provided. The elevated storage tank overflow must meet the requirements specified above.

7. OAC Rule 3745-83-01(C)(1) states that, "noncommunity public water systems serving a population of at least one thousand people and all community public water systems shall maintain a minimum chlorine residual of at least two-tenths milligram per liter free chlorine, or one milligram per liter combined chlorine measured at **representative points throughout the distribution system.**"

Chlorine monitoring is completed at the plant tap and in the distribution daily. However, ensure that the chlorine residual samples taken in the distribution system are taken at multiple locations that are representative of the entire system.

8. OAC Rule 3745-95-03 requires all public water systems to conduct periodic surveys and investigations of water use practices within consumers' premises to determine whether actual or potential cross connection could occur.

OAC Rule 3745-95-04 lists facilities where backflow prevention devices are required. The type of acceptable backflow devices are listed in OAC Rule 3745-95-05. OAC Rule 3745-95-06 requires the public water system see that the consumers test and inspect the devices at least once every twelve months. The inspections and tests must be completed by the supplier of water or a person approved by the supplier as qualified to inspect and test backflow devices.

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An ordinance must be enacted that includes periodic surveys and investigations of potential cross connections and requires and documents inspections of all required backflow prevention devices at least annually.

The water system must respond in writing within 15 days from the date of this letter with the required information. Failure to comply may result in further enforcement action.

If you have any questions, please contact me at 419-373-3101 or via Email at ben.smith@epa.state.oh.us.

Sincerely,



Ben Smith
Environmental Specialist 2
Division of Drinking and Ground Waters

/l/r

pc: David Clark, Village Superintendent
Seneca County Health Department
DDAGW, CO, attn: Dave Evans
DBAGW; NWDO file; Village of Bettsville