



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Allen County
Allen East Local School
NTNC Water System
PWS ID# 0254212

Certified Mail

OH0254212

ALLEN EAST LOCAL SCHOOLS

8/2/2007

August 2, 2007



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Mr. Michael Richards, Superintendent
Allen East Local Schools
9105 Harding Hwy
Harrod, Ohio 45850

Dear Mr. Richards:

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

This letter is notification that the Allen East Local Schools has not complied with requirements issued during this Agency's last survey performed on May 30, 2007, in violation of Ohio Administrative Code, Rule 3745-81-60. The Allen East Local Schools was notified in correspondence dated June 14, 2007 of the requirement to respond in writing within 45 days, with a schedule for corrective actions to address the following:

1. OAC Rule 3745-81-21(A) states that, public water systems shall maintain a written bacteriological sample siting plan.

Update the existing copy of the bacteriological sample siting plan and submit a copy, along with the written response to this letter, within 45 days from the date of this letter.

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.

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I provided a template copy of a Disinfectants / Disinfection Byproducts Sample Monitoring Plan during the May 30, 2007 survey. Submit a completed copy of the facility specific Disinfectants / Disinfection Byproducts Sample Monitoring Plan to Ohio EPA, along with the written response to this letter, within 45 days from the date of this letter.

3. 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 Allen East Local School 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."

4. OAC Rule 3745-83-01 requires that free and combined chlorine residuals be measured at the plant tap and in the distribution system daily (seven days per week) and that the water system must be monitored at the entry point for hardness on a weekly basis using a state certified lab. Plant Production must also be recorded daily.

OAC Rule 3745-83-01(E) requires submittal of an operational report (EPA Form 5002) no later than the tenth of the month following the month being reported [e.g., June's monthly operational report should be submitted to the district office no later than July 10th].

Daily and weekly testing, specified above, must be completed and reported **monthly**, on EPA Form 5002, beginning in July 2007. The July 2007 monthly report must be submitted to Ohio EPA, Northwest District Office by August 10, 2006. Additional copies of EPA Form 5002 can be located at <http://www.epa.state.oh.us/ddaqw/drinkforms.htm>

5. OAC Rule 3745-81-70 (E) requires that **total chlorine** residual measurements be taken at the same time total coliform bacteria samples are collected. The total chlorine residuals obtained during routine and repeat total coliform bacterial monitoring events are to be reported on the Quarterly Operating Report (EPA Form 5114) by the 10th of the month following the end of the calendar quarter being reported.

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Adequate protection must be provided for the wells to protect them from damage and potential contamination, including at a minimum, barricades protecting the casing and additional grading around the well casing to ensure that water does not pond around the well casings and potentially contaminate the water source.

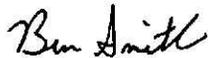
10. OAC Rule 3745-95 requires that a public water system be protected from contamination due to backflow from other sources.

The drain/flushing line from the hydro-pneumatic tank must be protected against contamination by maintaining an appropriately installed air gap (at least 2 times the diameter of the drain line) at the point of discharge into the drain. Ensure that an appropriate and permanent air gap is installed for all backwash/drain/flushing lines from the system.

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 II
Division of Drinking and Ground Waters

JW/lb

pc: Mick Dearth, Maintenance Supervisor
Nancy Tobe, Fanning & Howey, Engineer
Larry Core, Operator of Record
Allen County Health Department
Dave Evans, DDAGW, Central Office
~~DDAGW, NWDO File~~
7005 1160 0002 4566 0047

ec: Ellen Gerber, DDAGW, NWDO
Lisa Jones-Gast, DDAGW, NWDO
Richard Kroeger, DDAGW, NWDO
Tom Poffenbarger, DSW, NWDO

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[i.e. The 3rd calendar quarter (July - September) must be submitted to the district office no later than October 10th.]

Total chlorine residual samples, only taken at the time of total coliform sampling, are to be included for the calculated averages on EPA form 5114. The quarterly total chlorine average from the most recent four quarters must be used to calculate the reported running annual average. Please contact me at (419) 373-3101 if assistance is needed when completing EPA Form 5114. Submit the first Quarterly Operating Report for Allen East Local School by October 10, 2007, for the third quarter of 2007. Additional copies of EPA Form 5114 can be located at <http://www.epa.state.oh.us/ddaqw/drinkforms.htm>

6. OAC Rule 3745-81-21(A)(1)(a) requires that a community water system serving a population of 1,001 to 2,500 take a minimum of **two** routine total coliform sample per month from the distribution system and in accordance with the facility specific sample siting plan.

Allen East Local School must begin routine **monthly** total coliform sampling in July 2007.

7. OAC Rule 3745-81-86 requires that the facility with a population between 501 and 3,300 obtain twenty lead and copper samples from selected sampling locations taken once during two consecutive six month periods. If samples do not exceed the action level during the two consecutive six month monitoring periods reduced sampling sites and sampling frequency can be approved by the director.

Lead and copper sampling must begin with **twenty** samples taken at specified locations during the **first six month period of July to December 2007**. Copies of the lead and copper reporting forms and instructions can be located on the Ohio EPA web site at <http://www.epa.state.oh.us/ddaqw/drinkforms.htm>

If lead and copper samples are taken over the summer when there is minimal water use, ensure that the system is flushed before the samples are taken. However, the water must have sat in the pipes for at least six hours prior to the collection of the samples. If samples are taken while school is in session the samples must be taken early in the morning prior to use of the water by the students so the minimum of six hours can be met.

8. A complete monitoring schedule for the facility, including all additional sampling requirements will be mailed to the owner of the public water system in the future. All sampling specified on the schedule is required to be completed at the times specified.
9. OAC Rule 3745-9-05(U)(1) states that, "Casing and top of well shall be protected against contamination or inadvertent damage."

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SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
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<p>1. Article Addressed to:</p> <p>Mr Michael Richards Allen East Seal School 9105 Harding Hwy Harrod Oh 45840</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>7005 1160 0002 4566 0047</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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<p>Sent To</p> <p>Mr Michael Richards Allen East Seal School 9105 Harding Hwy Harrod Oh 45840</p>	
<p>PS Form 3800, June 2002 See Reverse for Instructions</p>	