



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



November 9, 2012

NOTICE OF VIOLATION – ACTION REQUIRED

Ronald E Stephens
8263 Hayesville Rd
Kingston, OH 45644

Hocking County
Laurelville, Village of
COMMUNITY PWS
PWS ID: OH3700512

Dear Mr. Stephens:

The Laurelville public water system is in violation of the Ohio Administrative Code (OAC) for:

Failure to respond in Writing within 30 days

This letter is notification that the Laurelville public water system has not complied with requirements issued during this Agency's last sanitary survey performed on June 27, 2012, in violation of rule 3745-81-60 of the Ohio Administrative Code. The PWS was notified in correspondence dated July 9, 2012, to respond in writing no later than 30 days, with time frames for:

PREVIOUS REQUIREMENTS

Several required items were noted during the last inspection report dated June 1, 2010, as being deficient. The following is a list of those requirements and a notation as to whether they have or have not been adequately addressed.

1. Ohio Administrative Code 3745-95 required all public water systems have an effective Backflow Prevention Program when it was originally enacted in 1980. Although a backflow ordinance was passed by the Village in the past, Laurelville has shown no evidence that the program was ever put in place or is being enforced. The Village has had over 20 years to establish a backflow prevention program. A letter dated 1961 shows that the Village was notified of this type of danger to its system over 50 years ago. Due to the continued lack of performance, the Village must **submit a schedule to this office within 30 days** stipulating the time frames in which the following activities will be performed:
 - Update the ratified ordinance detailing the requirements and expectations of OAC 3745-95, if necessary, and **submit a copy to this office.**
 - Identify all users within the Village that are required to have backflow prevention devices installed. This would include the following users:
 - mortuaries; clinics; nursing homes; laboratories; sewage treatment plants; sewage pumping stations; storm water pumping stations; food and beverage processing plants; chemical plants; metal plating industries; petroleum processing or storage plants, car washes and any user with an alternative water source (well, cistern, etc.) which could have a cross-connection within the primary residence.

- Install all necessary backflow prevention devices within the Village. It was unknown if the Village's wastewater plant was currently equipped with any backflow prevention device as required by OAC 3745-95-05 (A)(2):
"An approved air gap separation, an approved reduced pressure principle backflow prevention assembly or an approved reduced pressure detector check assembly shall be installed where a public water system may be contaminated with any substance that could cause a system or health hazard"
By this definition, the water service line to the wastewater plant must be equipped with at least an RPZ device.
- The Village is required to ensure that all backflow prevention devices installed are inspected at least yearly to ensure proper operations. These inspection records must be maintained by the water department for verification to Ohio EPA personnel.

Although not required, it is highly recommended that someone from the Village attend OTCO's Backflow Prevention Course to allow them to fully understand and identify where and what type of prevention devices should be installed. More information this course is available through OTCO's website at <http://www.ohiowater.org/otco/index.htm>.

2. Laurelville does have a Contingency Plan for emergencies related to their drinking water but it has not been updated in several years as required by OAC 3745-85-01. The Village was reminded during the last inspection of this issue and did not follow-up as required. Please update this document **and submit a copy to this office for review within 30 days.**
3. The Operator Certification Rules enacted in 2006 require that all operators maintain a log book of operation and maintenance records for each public water system. Mr. Stephens was able to provide adequate records to meet this requirement.
4. Well #2 was pumped to waste as an interceptor well beginning after the initial nitrate contamination event in 1998 until 2009 when levels confirmed it to be consistently below the MCL for this contaminant. This office gave approval to Mr. Stephens in April, 2009 to place this well back into operation for potable purposes after bacteria sampling verified its safety. The waste line for Well #2 was initially connected to the main discharge line for the well through a single valve. This interconnect is considered a major sanitary risk now that the well is being utilized for potable water. Unsafe water from the creek backflows into this line during the frequent flooding events which could easily leak through the single valve and into the distribution system. It is required that the valve be removed and the bypass line capped off to prevent the possible contamination of Laurelville's water system. **Please respond within 30 days with scheduled date in which this modification will be completed.**

NEW REQUIREMENTS

1. Laurelville has exceeded the MCL for Nitrate twice in the past 12 months. This is considered a severe violation and must be addressed immediately. It was noted that the Village had purchased softening equipment to install in the hopes of reducing the levels in the discharge. This unit has not been installed due to lack of plan approval from Ohio EPA. Detail plans were submitted on January 19, 2011 with a comment letter from OEPA on February 25, 2011. The Village received a letter from Mr. John Arduini on May 7, 2012, reminding the Village that these plans will be considered "dead" if the agency does not receive a response by **July 1, 2012**. Mr. Hettinger stated in his May 21, 2012, letter to Mr. Arduini that he will be able to meet this deadline.

Please be advised that failure to meet this deadline may result in enforcement action against the Village.

If you have any questions please call your Ohio EPA representative at 740-380-5207.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Wallace".

Sarah Wallace
Environmental Engineer

SW/cb

ec: SEDO DDAGW AA (State Violation)
cc: Hocking County Health Department