



State of Ohio Environmental Protection Agency

Northeast District



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

September 23, 2008

RE: WAYNE COUNTY  
CASKEYS INC.  
TRANSIENT WATER SYSTEM  
PWS ID # OH8535812  
STU ID # 855966

Mr. Jon Caskey  
14847 Fosnight Rd.  
Orrville, OH 44667

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

Dear Mr. Caskey:

This letter is notification that the Caskeys Inc. PWS has not complied with requirements issued during this Agency's last survey performed on July 22, 2008, in violation of rule 3745-81-60 of the Ohio Administrative Code. Caskeys Inc. was notified in correspondence dated July 31, 2008, to respond in writing within 45 days of receipt of your letter, with time frames for the following requirements:

**REQUIREMENT(S)**

- Sample Siting Plan – During the previous surveys, I stated the requirement for a sample siting plan. OAC Chapter 3745-81-21(A) requires public water systems to prepare a written coliform bacteria sample siting plan. A sample siting plan is especially useful when the person who normally samples is unavailable. It includes information on where to collect the samples, how many to collect, and what laboratory is utilized for analysis. It includes an appendix with information on proper sampling techniques and also discusses what actions are required if a sample is found to be total coliform positive. I asked Caskeys to complete a plan and mail a completed copy to this office.

In violation of this rule, we still do not have a sample siting plan for Caskeys. **Please complete a sample siting plan (template was enclosed with July 2008 survey letter) and return it to this office.** Please maintain a copy on site for subsequent inspections.

- Public Notification - Our records indicate that Caskeys failed to post a public notice for the aforementioned violations. Failing to post a notice is a violation of OAC 3745-81-32, which states "the owner or operator of a public water system which fails to perform the monitoring established by this chapter, or fails to comply with a testing procedure required by this chapter, or is granted a variance or exemption pursuant to this chapter, shall notify persons served by the public water."

**In order to correct the violations, you must post public notices (enclosed with July 2008 survey letter) for the violations.** The notices must be posted for a minimum of ten days. Within 45 days, please send a copy of the notices that you posted, along with the completed verification forms (back side of or stapled to the public notice), to this office.

- Well Isolation Area - During the survey, we observed the area surrounding the well, inside the well house. The area contained some chemical containers, including wasp spray and bleach. **You must keep the well field clean and maintain a sanitary isolation of 50 feet from all potential contaminant sources.**

According to OAC 3745-9-04, a well shall be located on property owned by the PWS and located where sanitary isolation can be maintained. Potential sources of contamination may not be placed within the isolation radius.

- Yard Hydrants - According to OAC Chapter 3745-99-01, the installation of yard hydrants where water is available or accessible for drinking or culinary purposes and having drip openings below ground surface is prohibited unless such hydrants are equipped with approved devices to prevent entrance of ground water into chambers connected with the water supply.

Please check to see if you have yard hydrants with the drip openings. **If you have these types of hydrants, they must be replaced or the weep holes must be plugged.** Any hydrant that would be used throughout the winter would have to be replaced with non-weepole, freeze-proof design. We will require that this be initiated as soon as possible, and be completed within five (5) years.

We also asked you to consider the following recommendations:

#### **RECOMMENDATION(S)**

- Well Cap – During the survey, we observed your well. Your well has a sanitary seal that appears to be tightly secured to the well casing. However, the well and seal appear to be old and highly corroded. When the seal no longer inhibits surface contaminants from entering the well, the seal should be replaced by a permanent well cap that meets the following requirements:
  - According to OAC 3745-9-05(P), a "well shall have a well cap or seal to prevent the entrance of water, dirt, animals, insects, or other foreign matter. The top of the casing at its finished height shall be cut so that the surface will fit flush with the well cap and provide a tight seal. The well cap or seal shall fit securely to the top of the well casing, be secured with screws or other appropriate connections, and vent to the atmosphere."
  - According to OAC 3745-9-05(T), "a vent shall be provided on all well caps and seals... A well vent shall be self-draining, screened with a non-corroding 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, and at least twelve inches above the well house floor or concrete apron surface."
- Raw Water Tap – We recommend that a sample tap be installed upstream of the pressure tank so that a raw water sample representative of the well can be obtained. If a routine sample result should be reported as total coliform positive, and some or all of the required repeat sample results are also positive, this raw water sample will assist in determining if

the bacteria is coming from the well. In addition, the new Groundwater Rule, which will affect most PWSs and will become effective December 1, 2009, will require that when a total coliform positive result is received from the distribution system, a sample must be collected from the well. This sample tap should be located before the pressure tank, at a location that is easily accessible and where the sample bottle can easily be filled up. The tap should be smooth-nosed (not the type used for a hose) and produce a smooth, pencil-thin flow of reasonable velocity.

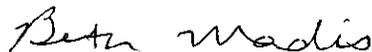
- SWAP – The 1996 Amendments to the Safe Drinking Water Act require Ohio EPA to conduct source water assessments for all public water systems. The assessment of your water system will assist you in identifying the potential threats to your water supply, and help you develop protective strategies for your water supply. These reports contain checklists of protective strategies for contaminant sources identified within the report. The reports also identify the susceptibility of your sources to contamination. A SWAP report was issued to your PWS on March 18, 2005, and identified the susceptibility of your source to contamination as **high**.

Please review your report and complete the checklists of protective strategies. Return the checklist to this office within 45 days of this letter date. Specific questions that you may have about the SWAP report can be answered by contacting Conni McCambridge at (330) 963-1200.

**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 (330) 963-1194.

Sincerely,



Beth Madis  
Environmental Specialist  
Division of Drinking and Ground Waters

BRM/ams

cc: Ohio EPA, Central Office, DDAGW / OFAS  
Wayne County Health Department