



State of Ohio Environmental

Northeast District



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

July 9, 2008

RE: WAYNE COUNTY
BETHANY CHRISTIAN DAY SCHOOL
15535 CHURCH RD., DALTON, OH
NON-TRANSIENT, NON-COMMUNITY
PUBLIC WATER SYSTEM
PWS ID # OH8531212
STU ID # 8559639

Mr. Michael Eberly
Bethany Christian Day School
13523 Western Rd.
Apple Creek, OH 44606

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

Dear Mr. Eberly:

This letter is notification that the Bethany Christian Day School PWS has not complied with requirements issued during this Agency's last survey performed on March 26, 2008, in violation of rule 3745-81-60 of the Ohio Administrative Code. Bethany Christian Day School was notified in correspondence dated April 17, 2008, to respond in writing, with time frames for the following requirements:

REQUIREMENT(S)

Per OAC 3745-81-60(D), a responsible official of the public water system must respond, in writing, within 45 days, indicating how and on what schedule the system will address the following new requirements determined as a result of the sanitary survey:

- **Routine Monitoring** - It is a requirement to perform routine water sampling as required by the Director. You must be vigilant about conducting your total coliform monitoring in accordance with OAC 3745-81-21 and following your yearly monitoring schedules issued to you at the end of the previous year from our central office. For your convenience, monitoring schedules are available for viewing at our Website listed below.

Since the previous survey was conducted, Bethany Christian has been issued four monitoring and reporting notices of violation. A summary of the violations is outlined in the following table:

Date	Violation	Violation Period	Public Notification (PN) / Verification of PN Date
7/15/04	Total Coliform Monitoring	Apr-Jun 04	none
2/2/05	Total Coliform Monitoring	Feb 05	4/11/05
1/18/07	Total Coliform Monitoring	Dec 06	none

- Public Notification - Our records indicate that Bethany Christian failed to post a public notice for two of the three 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 for these violations. The notice 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 public notice), to this office.

RECOMMENDATION(S)

The following deficiencies are not regulatory violations, but are actions that are recommended by this Agency for optimum operation and to reduce the potential for future violations or contamination:

- 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.
- Well Cap – During the survey, we observed your well. Your well has a well cap that is tightly secured to the well casing. However, these types of caps are considered to be temporary well caps. The well cap 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 pitiless 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."

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- 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 December 9, 2003, and identified the susceptibility of your source to contamination as low.

Please 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 Kathy Metropulos at (330) 963-1149.

- Operations - During the survey, I noticed a cartridge filter located downstream of the pressure tank. Please note that filters such as this may harbor bacteria if not properly maintained. Please check the manufacturer's directions for proper maintenance and cleaning procedures.

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