



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

April 3, 2013

RE: STARK COUNTY
VFW POST #7490
TRANSIENT WATER SYSTEM
PWS ID #OH7643912
VIOLATION

Mr. Bob Nyland, Post Commander
VFW Post #7490
7459 Columbus Road
Louisville, OH 44641

SUBJECT: FAILURE TO RESPOND IN WRITING TO SANITARY SURVEY REQUIREMENTS

Dear Mr. Nyland:

On November 16, 2012, I conducted a sanitary survey of the VFW Post #7490 public water system. You were interviewed and the water system was inspected in your presence.

On January 10, 2013, I sent you a survey letter that identified the regulatory requirements that the VFW Post #7490 PWS failed to meet and the actions which must be taken to return to compliance.

Ohio Administrative Code (OAC) Rule 3745-81-60(D) requires a public water system to respond, in writing within 30 days, indicating how and on what schedule the system will address the sanitary survey requirements. ***As of the date of this letter, you have not responded to the requirements outlined in my January 10, 2013 survey letter and are in violation of OAC Rule 3745-81-60(D).***

Identified below are the unresolved regulatory requirements for which action must be taken to return to compliance, and recommendations to address deficiencies that have the potential to cause future violations or contamination.

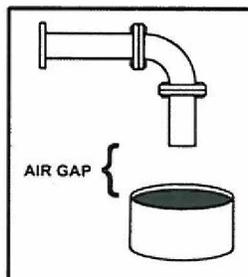
REQUIREMENTS

1. **Bacteria Sample Siting Plan** – OAC Rule 3745-81-21(A) requires each PWS to develop and maintain a bacteria sample siting plan. A sample siting plan was not available, so you and I completed one during the sanitary survey. This siting plan includes information such as: Where to obtain sample containers; who to send samples to; how and when to collect a sample; a list of appropriate sample locations; and procedures to follow when a total coliform (TC) result is positive. ***Update your plan annually, and keep a copy in your drinking water equipment room or files so that it will be readily available for future inspections.***
2. **Air Gap Separation** - OAC 3745-95-05(A)(1) requires an acceptable air gap where a public water system has the potential to be contaminated with substances that could cause a severe health hazard.



Submerged Drain

Unacceptable



Acceptable

This air gap is needed to prevent any possible wastewater contamination from entering the drinking water supply via backflow. The air gap must be at least twice the diameter of the backwash line or one inch, whichever is greater. ***An acceptable air gap is needed between the water softening and iron filter backwash lines and the floor drain in the mechanical room.***

3. **NSF Approved Chemicals** - OAC 3745-83-01 (D) requires that all chemicals used in a public water system be approved by the National Sanitation Foundation (NSF), Standard 60. As no treatment chemical packaging or records were present at the time of the

survey, it could not be determined whether the chemical being used for iron and manganese removal (potassium permanganate) is NSF approved. ***Ensure that you are using an NSF approved chemical.***

RECOMMENDATIONS

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:

- **Depressurization and Well Disinfection** – Depressurization and disinfection of the well were discussed during the survey visit. If a system depressurizes, or if the system is opened up for repairs or replacement of equipment, it is very important to disinfect the well and distribution system as bacteria may have entered the water system during the depressurization event. Disinfection can be performed by the owner, operator, or a business that services water systems. ***Please see the enclosed instructions on how to disinfect a well and distribution system in the event that depressurization occurs.***
- **Pressure Tank Recommendation** - During the sanitary survey, it was discovered that your pressure tank does not appear to have a pressure relief valve. It is recommended that the pressure tank have an automatic or manual pressure relief valve. Please have your pressure tank inspected by a water system specialist and have any deficiencies identified addressed as soon as possible.

Please respond in writing to the requirements mentioned above within 10 days of the date of this letter. If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me at (330) 963-1164, or by e-mail at christopher.maslo@epa.ohio.gov. Additional information concerning existing and upcoming drinking water regulations and requirements can be obtained from our Website at <http://epa.ohio.gov/Water.aspx>.

Sincerely,



Chris Maslo
Environmental Specialist
Division of Drinking and Ground Waters

CM:ds

cc: Ohio EPA, DDAGW-OFAS, CO
Stark County Health Dept.

ec: Stivo DiFranco, Environmental Supervisor, Ohio EPA, DDAGW, NEDO
Chris Maslo, Environmental Specialist, Ohio EPA, DDAGW, NEDO