



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

September 16, 2013

RE: WAYNE COUNTY
LAZY B CAMP
TRANSIENT PUBLIC WATER SYSTEM
PWS ID # OH8531012
STU ID # 8559638

Keith Milton
Lazy B Camp
8375 Friendsville Rd.
Wooster, OH 44691

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

Dear Mr. Milton:

This letter is notification that the Lazy B Camp public water systems have not complied with requirements issued during this Agency's last survey performed on July 9, 2013, in violation of rule 3745-81-60 of the Ohio Administrative Code. Lazy B Camp public water systems were notified in correspondence dated July 15, 2013, to respond in writing within 30 days of receipt of your letter, with time frames for the following requirements:

REQUIREMENT(S):

- Well Cap – During the previous survey, we noted that your well cap was older and in order to keep contaminants from entering your well, you need to ensure your well is kept in good condition. Your well cap did not appear to be securely fastened or able to be fastened in a manner to inhibit contaminants from entering your well. We stated that you would need to replace it with a new gasketed and vented water tight cap that meets the specifications set forth in OAC 3745-9-05(P).

As required, a new, proper cap was affixed to the well.

During this survey, though, we noticed that the conduit had cracked. This will need to be replaced immediately.

- Yard Hydrants – During the previous survey, we discussed yard hydrant requirements stated in OAC Chapter 3745-99-01. This regulated stated that 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.

We required you to see if you have yard hydrants with the drip openings. If you have these type 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-weep hole, freeze-proof design. We required that this be initiated as soon as possible, and be completed within five (5) years.

Since the previous survey was conducted, the regulations regarding yard hydrants have changed. Effective April 19, 2012, OAC 3745-95-09(A) states:

1. Yard hydrants with weep holes used for human consumption installed on a public water system are prohibited unless the weep holes are sealed.
2. Yard hydrants with weep holes not used for human consumption installed on a public water system, and those installed on a consumer's water system, shall have an appropriate backflow prevention assembly on the service line to protect the public water system. Yard hydrants with weep holes installed on public water systems shall be clearly labeled as "non-potable" or "not for human consumption."

Since your hydrants are for human consumption, the newer regulations result in no change to your requirements.

In violation of this rule, there are many standard yard hydrants (with weepholes) still at your PWS. Five years has passed since the previous survey was conducted. **Please inventory the hydrants that will still be required to be replaced and replace them within 1 year of the date of this letter.**

- Monitoring - 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.

In the past three years, Lazy B Camp has been issued several notices of violation. A summary of the violations is outlined in the following table:

Letter Date	Violation	Violation Period	Public Notification (PN) / Verification of PN Date
11/2/10	Total Coliform Monitoring	Jul-Sep 10	none
2/15/11	Nitrate Monitoring	Jan-Dec 10	none
4/29/11	Total Coliform Monitoring	Jan-Mar 11	none
2/1/12	Total Coliform Monitoring	Oct-Dec 11	none
1/29/13	Total Coliform Monitoring	Oct-Dec 12	6/17/13

Although required, we have no record that public notices were issued for most of these violations.

- Public Notification - Our records indicate that Lazy B Camp failed to post public notices for four of 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) for the monitoring violations. The notices must be posted for a minimum of ten days. Within 30 days, please send a copy of the notices that you posted, along with the completed verification forms (back side of the public notice), to this office.

- NSF Chemicals – During the survey, winterizing of the campers by injecting a food-grade antifreeze into the lines. According to OAC 3745-83-01(D),

"All chemicals, substances, and materials added to or brought in contact with water in or intended to be used in a public water system or used for the purpose of treating, conditioning, altering, or modifying the characteristics of such water shall be shown by either the manufacturer, distributor, or purveyor to be non-toxic and harmless to humans when used in accordance with the formulation and concentration as specified by the manufacturer, and shall conform with the "American National Standards Institute/National Sanitation Foundation" (ANSI/NSF) standard 60 Drinking Water Treatment Chemicals – Health Effects (2005 and previous), or standard 61 Drinking Water System Components - Health Effects (2005 and previous)."

Please note that if you use antifreeze in any part of your PWS, it must conform to these standards.

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 affects most PWSs and became effective December 1, 2009, requires 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

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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.

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