

Wetzler/Haynes Water Filtration Plant Byesville, OH

2023 Consumer Confidence Report

Introduction

We are pleased to present this year's Annual Water Quality Report (Consumer Confidence Report) as required by the Safe Drinking Water Act (SDWA). The Village of Byesville Wetzler/Haynes water filtration plant had an Unconditional License to Operate in 2023. This report is designed to provide details about where your water comes from, what it contains, and how it compares to standards set by regulatory agencies. This report is a snapshot of last year's water quality. We are committed to providing you with information because informed customers are our best allies.

Where does my water come from?

The Village of Byesville Water receives its source water from underground mine aquifers.

The Village of Byesville Water also has an emergency connection with the City of Cambridge. This connection was not utilized in 2023. This report does not contain information on the water quality received from the City of Cambridge, but a copy of their consumer confidence report can be obtained by contacting the City of Cambridge Water at 740-439-2130.

Source water assessment and its availability

The Village of Byesville Water receives its drinking water from underground mine aquifers. The Village of Byesville Water also has an emergency connection with the City of Cambridge. This connection was not utilized in 2023. This report does not contain information on the water quality received from the City of Cambridge, but a copy of their consumer confidence report can be obtained by contacting the City of Cambridge-Water at 740-439-2130. The state performed an assessment of our source water in 2003. It was determined that the aquifer supplying drinking water to Byesville, OH has a high susceptibility to contamination. This conclusion is based on the presence of a thin protective layer of clay overlaying the aquifer, no evidence to suggest that ground water has been impacted by any significant levels of chemical contaminants from human activities, and the presence of significant potential contaminant sources in the protection area. Please contact the Water Superintendent at 740-685-0800 if you would like more information about the assessment.

Why are there contaminants in my drinking water?

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not necessarily indicate that water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the Environmental Protection Agency's (EPA) Safe Drinking Water Hotline (800-426-4791). The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs, and wells. As water travels over the surface of the land or through the ground, it dissolves naturally occurring minerals and, in some cases,

radioactive material, and can pick up substances resulting from the presence of animals or from human activity, microbial contaminants, such as viruses and bacteria, that may come from sewage treatment plants, septic systems, agricultural livestock operations, and wildlife; inorganic contaminants, such as salts and metals, which can be naturally occurring or result from urban stormwater runoff, industrial, or domestic wastewater discharges, oil and gas production, mining, or farming; pesticides and herbicides, which may come from a variety of sources such as agriculture, urban stormwater runoff, and residential uses; organic Chemical Contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban stormwater runoff, and septic systems; and radioactive contaminants, which can be naturally occurring or be the result of oil and gas production and mining activities. In order to ensure that tap water is safe to drink, EPA prescribes regulations that limit the amount of certain contaminants in water provided by public water systems. Food and Drug Administration (FDA) regulations establish limits for contaminants in bottled water which must provide the same protection for public health.

Do I need to take special precautions?

Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. EPA/Centers for Disease Control (CDC) guidelines on appropriate means to lessen the risk of infection by *Cryptosporidium* and other microbial contaminants are available from the Safe Water Drinking Hotline (800-426-4791).

Additional Information for Lead

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. Wetzler/Haynes Water Filtration Plant is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <http://www.epa.gov/safewater/lead>.

Additional Information for Arsenic

While your drinking water meets EPA's standard for arsenic, it does contain low levels of arsenic. EPA's standard balances the current understanding of arsenic's possible health effects against the costs of removing arsenic from drinking water. EPA continues to research the health effects of low levels of arsenic which is a mineral known to cause cancer in humans at high concentrations and is linked to other health effects such as skin damage and circulatory problems.

Water Quality Data Table

In order to ensure that tap water is safe to drink, EPA prescribes regulations which limit the amount of contaminants in water provided by public water systems. The table below lists all of the drinking water contaminants that we detected during the calendar year of this report. Although many more contaminants were tested, only those substances listed below were found in your water. All sources of drinking water contain some naturally occurring contaminants. At low levels, these substances are generally not harmful in our drinking water. Removing all contaminants would be extremely expensive, and in most cases, would not provide increased protection of public health. A few naturally occurring minerals may actually improve the taste of drinking water and have nutritional value at low levels. Unless otherwise noted, the data presented in this table is from testing done in the calendar year of the report. The EPA or the State requires us to monitor for certain contaminants less than once per year because the concentrations of these contaminants do not vary significantly from year to year, or the system is not considered vulnerable to this type of contamination. As such, some of our data, though representative, may be more than one year old. In this table you will find terms and abbreviations that might not be familiar to you. To help you better understand these terms, we have provided the definitions below the table.

Contaminants	MCLG or MRDLG	MCL, TT, or MRDL	Detect In Your Water	Range		Sample Date	Violation	Typical Source
				Low	High			
Disinfectants & Disinfection By-Products								
(There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants)								
Chlorine (as Cl ₂) (ppm)	4	4	2.1	.49	2.10	2023	No	Water additive used to control microbes
Haloacetic Acids (HAA5) (ppb)	NA	60	18.45	11.1	23.8	2023	No	By-product of drinking water chlorination
TTHMs [Total Trihalomethanes] (ppb)	NA	80	75.4	21.8	75.4	2023	No	By-product of drinking water disinfection
Total Organic Carbon	NA	1	2.19	1.83	2.65	2023	No	Naturally present in the environment
Inorganic Contaminants								
Arsenic (ppb)	0	10	1.08	NA	NA	2023	No	Erosion of natural deposits; Runoff from orchards; Runoff from glass and electronics production wastes
Chromium (ppb)	100	100	2.72	NA	NA	2023	No	Discharge from steel and pulp mills; Erosion of natural deposits
Fluoride (ppm)	4	4	1.37	1.1	1.37	2023	No	Erosion of natural deposits; Water additive which promotes strong teeth; Discharge from fertilizer and aluminum factories
Selenium (ppb)	50	50	3.92	NA	NA	2023	No	Discharge from petroleum and metal refineries; Erosion of natural deposits; Discharge from mines
Microbiological Contaminants								
Turbidity (NTU)	NA	1.0	TT	0.04	0.05	2023	No	Soil runoff
<p>99% of the samples were below the TT value of 1. A value less than 95% constitutes a TT violation. The highest single measurement was . Any measurement in excess of 5 is a violation unless otherwise approved by the state. Turbidity is a measure of the cloudiness of water and is an indication of the effectiveness of our filtration system. The turbidity limit set by the EPA is 0.3 NTU in 95% of the samples analyzed each month and shall not exceed 1 NTU at any time. As reported above, the Village of Byesville highest recorded turbidity result for 2023 was 0.05 NTU</p>								

Contaminants	MCLG	AL	Your Water	Sample Date	# Samples Exceeding AL	Exceeds AL	Typical Source
Inorganic Contaminants							
Copper - action level at consumer taps (ppm)	1.3	1.3	.4585	2023	0	No	Corrosion of household plumbing systems; Erosion of natural deposits
Lead - action level at consumer taps (ppb)	0	15	8.64	2023	(3 AL's) 16.1, 116, 23.3	No	Corrosion of household plumbing systems; Erosion of natural deposits

Additional Monitoring (UCMR5)

As part of an on-going evaluation program the EPA has required us to monitor some additional contaminants/chemicals. Information collected through the monitoring of these contaminants/chemicals will help to ensure that future decisions on drinking water standards are based on sound science.

Unregulated contaminants are those for which U.S. EPA has not established drinking water standards. The purpose of unregulated contaminant monitoring is to assist EPA in determining the occurrence of these contaminants in drinking water and whether future regulation is warranted. In 2023 Byesville Water participated in the fifth round of the Unregulated Contaminant Monitoring Rule (UCMR 5). For a copy of the results please call at 740-685-2816

Contaminants (Units)	Sample Year	Average Level Found	Range of Detections	
			Low	High
Lithium (ppb)	2023	25.43	20	30.7

Unit Descriptions	
Term	Definition
ppm	ppm: parts per million, or milligrams per liter (mg/L)
ppb	ppb: parts per billion, or micrograms per liter (µg/L)
NTU	NTU: Nephelometric Turbidity Units. Turbidity is a measure of the cloudiness of the water. We monitor it because it is a good indicator of the effectiveness of our filtration system.
NA	NA: not applicable
ND	ND: Not detected
NR	NR: Monitoring not required, but recommended.

Important Drinking Water Definitions	
Term	Definition
MCLG	MCLG: Maximum Contaminant Level Goal: The level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.
MCL	MCL: Maximum Contaminant Level: The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.
TT	TT: Treatment Technique: A required process intended to reduce the level of a contaminant in drinking water.
AL	AL: Action Level: The concentration of a contaminant which, if exceeded, triggers treatment or other

Important Drinking Water Definitions	
	requirements which a water system must follow.
Variations and Exemptions	Variations and Exemptions: State or EPA permission not to meet an MCL or a treatment technique under certain conditions.
MRDLG	MRDLG: Maximum residual disinfection level goal. The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.
MRDL	MRDL: Maximum residual disinfectant level. The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.
MNR	MNR: Monitored Not Regulated
MPL	MPL: State Assigned Maximum Permissible Level

Notice of Violation

Attached to this report are violations as issued in 2023. If you have questions regarding any of these violations, please contact the Byesville Water Treatment Facility at 740-685-0800.

How do I participate in decisions concerning my drinking water?

You can participate in decisions regarding your water by contacting the treatment plant at (740) 685-0800, contacting the Village Administrator at (740) 685-0800 or by attending a Village Council meeting. The Village Council meets on the second and fourth Wednesday of the month at 221 East Main Avenue, Byesville, Ohio at 5:30p.m. Any questions regarding the meeting contact the Village Clerk at (740) 685-0800.

For more information please contact:

Contact Name: Brennan Dudley – Village Administrator
 Address: 59870 vocational Road
 City, State, Zip Code: Byesville, OH 43723
 Phone: 740-685-0800



Mike DeWine, Governor
Jon Husted, Lt. Governor
Anne M. Vogel, Director

Operational Evaluation Level Exceedance

January 27, 2023

Transmitted Electronically

RE: Byesville PWS
Compliance Review
Correspondence
Drinking Water Program
Guernsey County
PWS ID: OH3001212

BYESVILLE PWS
ATTN: BRENNAN DUDLEY, BDUDLEY@BYESVILLEOH.COM
221 MAIN STREET
BYESVILLE, OH 43723

Subject: Operational Evaluation Level Report Acceptance Letter

Ohio EPA is in receipt of your Operational Evaluation Level report (form 5031) for Byesville PWS. This report covers the 2nd quarter of 2019 as requested in the OEL exceedance letter from Ohio EPA on August 12, 2019.

In accordance with Ohio Administrative Code OAC 3745-81-24(C) a public water system that exceeds the OEL must conduct an operational evaluation and submit a written report of the evaluation within ninety days of notification.

Upon review of the submitted report, Ohio EPA has determined that it is acceptable and meets the requirements set forth in the rule.

Please keep in mind an OEL report will need to be prepared and submitted for any future monitoring period in which an OEL is exceeded. If you have any questions, please feel free to contact me at rex.haggy@epa.ohio.gov.

Sincerely,

Rex S. Haggy
Environmental Specialist III
Division of Drinking and Ground Waters
Southeast District Office

RH/cd

ec: Kendal Weisand, ORC, kweisend@byesvilleoh.gov
Hayley Zimmerman, Compliance Assurance Section, CO- DDAGW



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

NOTICE OF VIOLATION

April 6, 2023

Transmitted Electronically

**RE: Byesville PWS
Notice of Violation
Drinking Water Program
Guernsey County
PWS ID OH3001212**

Village of Byesville
Brennan Dudley, Village Administrator
221 Main Street
Byesville, OH 43723

Subject: Failure to Respond to Sanitary Survey Violation – Facility ID# 3054706 (COMM)

Dear Mr. Dudley:

The Village of Byesville is in violation of Ohio Administrative Code (OAC) Rule 3745-81-60 for failing to respond in writing within 30 days to the November 9, 2022, Notice of Violation (NOV) letter regarding the July 26 and October 3, 2022, Sanitary Survey. Ohio EPA received a response on February 28, 2023, that did not fully address the cited violations or provide dates by which the violations would be corrected. **Byesville must provide a written response within 15 days documenting that the violations have been resolved, or specifying the dates by which they will be resolved.**

VIOLATIONS

1. **In accordance with OAC Rule 3745-87-02, Asset Management Program:** *"In order to ensure the long-term viability of public water systems, all public water systems shall demonstrate the managerial, technical, and financial capability of the public water system to comply with this chapter and rules adopted thereunder. Demonstration of capability shall be made through a written description of an asset management program that is acceptable to the director."*

(a) The Asset Management Program did not include the following required items:

- i. A map of the distribution system showing water lines, hydrants, valves and latest update.
- ii. An operating plan, including:
 - Maintenance schedules or supporting documentation of maintenance performed.
 - Demonstration of an adequate maintenance log
 - A high-level table of organization that identifies critical personnel for water system operations, maintenance, treatment, and distribution.
 - Standard operating procedures for daily operation of the facility.

- iii. Identification of criteria to determine rehabilitation/replacement for water system components.
 - iv. A prioritized schedule in place for repair, rehabilitation, replacement, and expansion of existing water system components.
 - v. System identification of infrastructure changes necessary to meet future demand.
- (b) Your February 28, 2023, response stated that a map had been added to the Asset Management documents, but did not address items ii through v.
- (c) In order to return to compliance, Byesville must provide documentation that addresses these items. **Therefore, this violation has not been resolved.**

2. In accordance with OAC Rule 3745-85-01, Contingency Plans: *"Each community water system and wholesale system shall prepare and maintain a written contingency plan. When routine methods of delivery or treatment are compromised, the contingency plan shall provide for the protection of public health to the extent possible, through actions including but not limited to the notification of users, including the direct notification of critical users, the provision of alternate sources of water and the restoration of service."*

- (a) The Contingency Plan for the Byesville public water system did not include the following required items:
- i. A map of the distribution system showing water lines, hydrants, valves and latest update.
 - ii. Exercises of one or more of the circumstances in the plan each year, with the entire plan exercised every five years.
- (b) Your February 28, 2023, response stated that a map had been added to the Contingency Plan but did not address items ii or iii.
- (c) In order to return to compliance, Byesville must provide documentation of at least one exercise of a portion of the Plan, and after-action reports of any recent service disruptions. **Therefore, this violation has not been resolved.**

3. In accordance with OAC Rule 3745-95-02, Backflow Prevention and Cross-Connection Control: *"A public water system shall develop and implement a backflow prevention and cross-connection control program consistent with this chapter."*

- (a) The backflow prevention and cross-connection control program fails to meet the following requirements:
- i. Conduct inspections for all installed backflow prevention devices every 12 months.
 - ii. Have a mechanism to ensure that customers with auxiliary water systems (i.e., private wells) have the appropriate backflow protection and inspection.
 - iii. Periodically resurvey all customers to ensure that cross-connections have been identified.
 - iv. Testing of backflow preventers at treatment plants and other facilities owned by the water system/municipality every 12 months.

- (b) Your February 28, 2023, response included a copy of the backflow ordinance, but no documentation of it being implemented.
- (c) In order to return to compliance, Byesville must provide the following documentation:
 - A list of all facilities where backflow devices are required, the type of device installed and the last inspection and testing date. If the date is over twelve months past, include a schedule for conducting the inspection and testing. All inspection and testing must be done by a person certified to perform such work. A license to practice plumbing is not sufficient certification.
 - Records of resurveys of water use practices at all customers to ensure the proper device is installed. This can be an onsite inspection, or a questionnaire sent to the customers, and must be repeated every five years.

Therefore, this violation has not been resolved.

4. In accordance with OAC Rule 3745-83-01(H), Operational Requirements: *"The owner and operator shall ensure that all facilities and equipment necessary for the treatment and distribution of water shall be maintained, at a minimum so as to function as intended."*

- (a) The clearwell roof vents and overflow pipe screens were missing and the overflow screens on the Grudier, Country Club, Cumberland, and 800,000 finished water storage tanks needed replaced.
- (b) Your February 28, 2023, response included pictures of screens installed on the plant clearwell overflows and Cumberland tank overflow.
- (c) In order to return to compliance, Byesville must provide pictures of screens installed on the overflow pipes at the Grudier, Country Club and 800,000 tanks and on the clearwell roof vents. The clearwell overflow and roof vents must be 24-mesh or smaller insect screen. 24-mesh is also recommended for the elevated tank overflow pipes. All screens must be non-corrodible material and should be protected behind a flange and short pipe extension to protect them from damage. **Therefore, this violation has not been resolved.**

5. In accordance with OAC Rule 3745-83-01(H), Maintenance of Equipment and Facilities: *"The owner and operator shall ensure that all facilities and equipment necessary for the treatment and distribution of water shall be maintained, at a minimum so as to function as intended."*

- (a) The Byesville PWS was unable to calculate the percentage of unaccounted-for water loss.
- (b) Your February 28, 2023, response included a statement that 2021 water loss was calculated to be 12%.
- (c) In order to return to compliance, Byesville must provide the monthly plant production and metered usage data for 2022 showing water loss was still below 30%. **Therefore, this violation has not been resolved.**

6. In accordance with OAC Rule 3745-7-09, Recordkeeping requirements and responsibilities of owners, certified professional operators, and certified professional operators of record: *"the owner and professional operator of record of a public water system, treatment works or sewage system shall maintain or cause to be maintained operation and maintenance records for each public water system, distribution system, water treatment plant within a public water system, sewerage system, treatment works, or wastewater treatment facility within a treatment works. Records shall be maintained in hard bound books with consecutive page number; well organized computer logs, which automatically document the date, time and person making the entry and prevent the erasure or deletion of data; or an equivalent methodology sufficient to record the information set forth in this rule and approved by the director to ensure authenticity and accuracy. Separate log books or capture programs meeting the requirements above may be maintained for operation and maintenance activities. Records regarding operation and maintenance shall meet the following requirements: (2) The records shall be accessible onsite for twenty-four hour inspection by the agency or emergency response personnel."*

- (a) There is no identification of the persons making entries in the operational log book.
- (b) In order to return to compliance, Byesville must submit pictures of at least three non-consecutive days entries in the log book, demonstrating that recordkeeping requirements are being met. **Therefore, this violation has not been resolved.**

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 6109.23 and 6109.33 of the Ohio Revised Code.

If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me by email Eric.Hart@epa.ohio.gov or by phone at (740) 380-5274.

Sincerely,



Eric Hart
Environmental Specialist
Division of Drinking and Ground Waters

EH/cd

cc: Kendal Weisand, ORC, kweisend@byesvilleoh.gov
Robert Gerdau, Operator, rgerdau@byesvilleoh.gov
Brennan Dudley, Village Administrator, bdudley@byesvilleoh.gov
Ryan Murphy, Guernsey County Health Department, rmurphy@guernseycountyhd.org



July 10, 2023

Transmitted Electronically

**RE: Byesville PWS
Notice of Violation
Related Correspondence
Drinking Water Program
Guernsey County
PWS ID OH3001212**

Village of Byesville
Brennan Dudley, Village Administrator
221 Main Street
Byesville, OH 43723

Subject: Partial Resolution of Violation

Dear Mr. Dudley:

Thank you for the Village of Byesville's February 28, 2023, and April 28, 2023, responses to the November 9, 2022, Notice of Violation (NOV) letter regarding the sanitary survey of your public water system completed on July 26, 2022, and October 3, 2022. I have reviewed this documentation and determined that Byesville has adequately resolved some of the violations discovered during the sanitary survey. Byesville's response and the status of each of the violations is listed below.

RESOLVED VIOLATIONS

1. In accordance with OAC Rule 3745-87-02, Asset Management Program, and NOV letter citation #1: *"In order to ensure the long-term viability of public water systems, all public water systems shall demonstrate the managerial, technical, and financial capability of the public water system to comply with this chapter and rules adopted thereunder. Demonstration of capability shall be made through a written description of an asset management program that is acceptable to the director.*

Ohio EPA received Byesville's February 28, 2023, and April 28, 2023, responses wherein you documented updates to your Asset Management Program. **Therefore, this violation has been resolved.**

2. In accordance with OAC Rule 3745-85-01, Contingency Plans, and NOV letter citation #2: *"Each community water system and wholesale system shall prepare and maintain a written contingency plan. When routine methods of delivery or treatment are compromised, the contingency plan shall provide for the protection of public health to the extent possible, through actions including but not limited to the notification of users, including the direct notification of critical users, the provision of alternate sources of water and the restoration of service.*

Ohio EPA received Byesville's February 28, 2023, response wherein you reported the map had been added to the plan, and Byesville's April 28, 2023, response wherein you documented plan exercises. **Therefore, this violation has been resolved.**

3. **In accordance with OAC Rule 3745-83-01(H), Maintenance of Equipment and Facilities, and NOV letter citation #5:** *"The owner and operator shall ensure that all facilities and equipment necessary for the treatment and distribution of water shall be maintained, at a minimum so as to function as intended."*

Ohio EPA received Byesville's April 28, 2023, response wherein you documented 2022 unaccounted-for water loss was 20%. Ohio EPA recommends that water loss be reduced to under 15%. **Therefore, this violation has been resolved.**

OUTSTANDING VIOLATIONS

1. **In accordance with OAC Rule 3745-95-02, Backflow Prevention and Cross-Connection Control, and NOV letter citation #3:** *"A public water system shall develop and implement a backflow prevention and cross-connection control program consistent with this chapter."*
- (a) The backflow prevention and cross-connection control program fails to meet the following requirements:
- i. Conduct inspections for all installed backflow prevention devices every 12 months.
 - ii. Have a mechanism to ensure that customers with auxiliary water systems (i.e., private wells) have the appropriate backflow protection and inspection.
 - iii. Periodically resurvey all customers to ensure that cross-connections have been identified.
 - iv. Testing of backflow preventers at treatment plants and other facilities owned by the water system/municipality every 12 months.
- (b) Byesville's February 28, 2023, and April 28, 2023, responses included a copy of the backflow ordinance and described further intent to implement a backflow program but included no documentation of anything being completed. Please note that your Critical User List has nothing to do with backflow prevention and does not describe which customers should have backflow devices installed.
- (c) To return to compliance, Byesville must provide the following documentation:
- A list of all facilities where backflow devices are required, the type of device installed and the last inspection and testing date. If the date is over twelve months past, include a schedule for conducting the inspection and testing. All inspection and testing must be done by a person certified to perform such work. A license to practice plumbing is not sufficient certification.
 - Records of resurveys of water use practices at all customers to ensure the proper device is installed. This can be an onsite inspection, or a questionnaire sent to the customers, and must be repeated every five years. **Therefore, this violation has not been resolved.**

2. In accordance with OAC Rule 3745-83-01(H), Operational Requirements, and NOV letter citation #4: *"The owner and operator shall ensure that all facilities and equipment necessary for the treatment and distribution of water shall be maintained, at a minimum so as to function as intended."*

- (a) The clearwell roof vents and overflow pipe screens were missing and the overflow screens on the Grudier, Country Club, Cumberland, and 800,000 gallon finished water storage tanks needed replaced.
- (b) Ohio EPA received Byesville's February 28, 2023, and April 28, 2023, responses showing pictures of screens installed on the plant clearwell vents and overflows and the storage tank overflows. The screen on the Country Club overflow has a hole larger than the mesh size. The other screens are all lightweight window screen which is too fragile to be acceptable, and most are not securely fastened to the pipe. The clearwell screens have large gaps around the edges making them completely ineffective.
- (c) To return to compliance, Byesville must provide pictures of proper screens installed on all the overflow pipes and the clearwell roof vents. The clearwell overflow and roof vents must be 24-mesh or smaller insect screen. 24-mesh is also recommended for the elevated tank overflow pipes. All screens must be non-corrodible material (heavy gauge stainless steel is recommended) and should be protected behind a flange and short pipe extension to protect them from damage. **Therefore, this violation has not been resolved.**

3. In accordance with OAC Rule 3745-7-09, Recordkeeping Requirements, and NOV letter citation #6: *"the owner and professional operator of record of a public water system, treatment works or sewage system shall maintain or cause to be maintained operation and maintenance records for each public water system, distribution system, water treatment plant within a public water system, sewerage system, treatment works, or wastewater treatment facility within a treatment works. Records shall be maintained in hard bound books with consecutive page number; well organized computer logs, which automatically document the date, time and person making the entry and prevent the erasure or deletion of data; or an equivalent methodology sufficient to record the information set forth in this rule and approved by the director to ensure authenticity and accuracy. Separate log books or capture programs meeting the requirements above may be maintained for operation and maintenance activities. Records regarding operation and maintenance shall meet the following requirements: (2) The records shall be accessible onsite for twenty-four hour inspection by the agency or emergency response personnel."*

- (a) There was no identification of the persons making entries in the operational log book.
- (b) Ohio EPA received Byesville's April 28, 2023, response showing that log book entries were being initialed, but the log book used did not have the required pre-printed page numbering.
- (c) To return to compliance, Byesville must submit pictures of at least three non-consecutive days entries in a properly numbered log book, demonstrating that all recordkeeping requirements are being met. **Therefore, this violation has not been resolved.**

Please note that the submission of any requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in Section 6109.23 and 6109.33 of the Ohio Revised Code.

If you have any questions regarding this letter, or any other matter involving your water system, please feel free to contact me by email Eric.Hart@epa.ohio.gov or by phone at (740) 380-5274.

Sincerely,



Eric Hart
Environmental Specialist
Division of Drinking and Ground Waters

EH/cd

cc: Kendal Weisand, ORC, kweisand@byesvilleoh.gov
Robert Gerdau, Operator, rgerdau@byesvilleoh.gov
Brennan Dudley, Village Administrator, bdudley@byesvilleoh.gov
Ryan Murphy, Guernsey County Health Department, rmurphy@guernseycountyhd.org



ACTION REQUIRED

August 30, 2023

Transmitted Electronically

Village of Byesville
Brennan Dudley, Village Administrator
221 Main Street
Byesville, OH 43723

RE: Byesville
Compliance Review
Compliance Correspondence
Drinking Water Program
Guernsey County
PWS ID: OH3001212

Subject: Action Level Exceedance of Lead and Copper Rule; Facility ID: [3054706]

Dear Mr. Dudley:

We have reviewed the lead and copper monitoring data for the Byesville public water system, received on August 29, 2023. The results are summarized below, and they indicate that the action level for lead has been exceeded.

LEAD AND COPPER MONITORING SUMMARY

Compliance Period:	Annual		
Monitoring Period:	June 1 – September 30		
Sample Sites Required:	20	based on a population of:	5104
Sample Sites Reported:	20		
Lead 90 th Percentile:	0.0161 mg/L	The action level of 0.015 mg/L* was exceeded:	Yes
Copper 90 th Percentile:	0.449 mg/L	The action level of 1.3 mg/L* was exceeded:	No

*Action levels have two significant figures. Therefore, the lead 90th percentile must be at least 0.0155 mg/L and the copper 90th percentile must be at least 1.35 mg/L to exceed their respective action levels.

It is highly recommended that you schedule a meeting with us to discuss required actions as soon as possible.

All forms can be found at: <https://epa.ohio.gov/divisions-and-offices/drinking-and-ground-waters/public-water-systems/lead-and-copper-in-public-water-systems>

Southeast District Office 740|385 8501
2195 E. Front Street epa.ohio.gov
Logan, Ohio 43138 U.S.A.

Required Lead ALE Actions:

As indicated in the phone call dated August 30, 2023, Byesville must complete the following notification requirements:

1. Health Department Notification

By September 1, 2023, notify the Guernsey County Health department that Byesville has exceeded the action level for lead.

2. Lead Public Notice of ALE ("LPN")

By September 1, 2023, every residence must be provided with a lead public notice regarding the apparent ALE. A draft public notice is attached with this letter.

By September 4, 2023, the verification of this lead public notice issuance must be received by Ohio EPA, including an example of what was issued.

3. Public Education ("PE")

By October 11, 2023, provide lead public education information to all consumers about the presence of lead in drinking water. A lead public education template is attached.

Within 5 days of issuing PE, the verification of this lead public education must be received by Ohio EPA.

Due to the lead ALE, the following are additional requirements which must also be completed based on the schedules indicated:

4. Water Quality Parameter (WQP) Monitoring (OAC 3745-81-87)

By September 30, 2023, flush the sample taps, then collect and analyze samples for the water quality parameters listed below. Samples must be collected at the **entry point** to the distribution system **and from three (3) sites** within the distribution system. Each site must be sampled twice on different days (about a week apart is recommended). The distribution system sites do not need to be from sites where lead and copper samples were previously collected.

Results are to be used in preparation of your Corrosion Control Treatment Recommendation, discussed below, and must also be submitted on the Water Quality Parameter Monitoring Reporting Form (Previously Form 5108). Water quality parameters must be reported within 10 days following the month in which results are received (or collected, for parameters measured on site).

(Note: Sending results to us as soon as possible and scheduling a meeting to discuss preparation of your Corrosion Control Treatment Recommendation before it is due can be beneficial to all parties involved.)

The required sampling includes:

Required Entry Point WQPs

(Collected twice, at least one week apart)

- pH (measured on site)
- Water Temperature (measured on site)
- Alkalinity
- Calcium
- Total Dissolved Solids (TDS) or Conductivity
- Hardness
- Chloride
- Sulfate
- Iron
- Manganese
- Lead
- Copper
- Orthophosphate
- Total Phosphorus
- Free Chlorine
- Total Chlorine

Required Distribution Tap WQPs

(Collected twice from three sites, at least one week apart)

- pH (measured on site)
- Water Temperature (measured on site)
- Alkalinity
- Calcium
- Total Dissolved Solids (TDS) or Conductivity
- Hardness
- Orthophosphate
- Total Phosphorus
- Free Chlorine
- Total Chlorine

5. Flushed Entry Point Lead and Copper Monitoring (OAC 3745-81-88)

By September 30, 2023, collect and analyze a flushed entry point sample for lead and copper from each entry point to the distribution in your system. We recommend these samples are collected at the time of WQP sampling. These samples are to be used to complete the Source Water Treatment Recommendation, discussed below. Report these results on the [Entry Point Lead and Copper Reporting Form](#).

6. Corrosion Control Treatment Study (OAC 3745-81-81 & 81-82)

By March 31, 2025, submit a Corrosion Control Treatment (CCT) Study to the district. You may need to work with a consultant to help develop and conduct the study.

At a minimum, a CCT Study must include:

- a. A signed cover letter from your system that includes an executive summary of the study and a recommendation of the treatment option that the study indicates to be optimal CCT for your system.
- b. Documentation to support the recommended optimal CCT that includes the following:
 1. An evaluation of the effectiveness of each of the following CCT methods:
 - i. alkalinity and pH adjustment;
 - ii. calcium hardness adjustment; and
 - iii. addition of a phosphate- or silicate- based corrosion inhibitor at a concentration sufficient to maintain an effective residual concentration in all test tap samples.

2. Utilization of either pipe rig/loop tests, metal coupon tests, partial system tests, or analysis based on documented analogous treatments with other systems of similar size, water chemistry, and distribution system configuration.
 3. Measurement of lead, copper, and the water quality parameters listed above in any tests conducted, both before and after evaluating each of the CCT methods.
 4. Identification of all chemical or physical constraints that limit or prohibit the use of a particular CCT method at your system, as documented by data showing that the treatment is either ineffective or adversely affects other water quality treatment processes.
 5. An evaluation of the effect of chemicals used for CCT on other water quality treatment processes either already in place at your system or that may be proposed. Include a diagram of your existing water treatment plant facilities and highlight any proposed changes.
- c. An analysis of the evaluations conducted and data generated, and the rationale for the recommended optimal CCT option selected for your system.
 - d. (Optional) The Corrosion Control Treatment (CCT) Recommendation form may be utilized where applicable to document and report some of the required information. If utilized, the form should be completed using the Instructions for Completing the Corrosion Control Treatment Recommendation and submitted as an attachment to the CCT study.

7. Source Water Treatment Recommendation (OAC 3745-81-80 & 81-83)

Based on the results of the flushed entry point lead and copper samples required above, submit a Source Water Treatment (SOWT) Recommendation to this office **by March 31, 2024**.

8. Detail Plan Submittal (OAC 3745-91-02)

If significant changes to your water system are needed to implement the CCT Recommendation and/or SOWT Recommendation (e.g. installation of treatment), detail plans for those changes, must be submitted with the CCT Recommendation **by March 31, 2025**.

Additional Monitoring by Public Water Systems

Byesville inquired about collecting additional samples. Pursuant to Ohio Administrative Code 3745-81-86 (E), the results of any monitoring conducted in addition to the minimum requirements of this rule shall be considered by the public water system and the director in making any determinations, i.e., calculating the ninetieth percentile lead or copper level, under rule 3745-81-80 of the Administrative Code. It is this office's understanding that your PWS intends to conduct additional routine LCR monitoring during this monitoring period. An SMP ID spreadsheet with all sample sites identified must be completed and submitted to Ohio EPA prior to lead and copper monitoring. Lead and Copper monitoring and SMP ID guidance and templates are available on Ohio EPA's website:

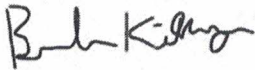
<https://epa.ohio.gov/divisions-and-offices/drinking-and-ground-waters/public-water-systems/lead-and-copper-in-public-water-systems>

Please note that these additional routine compliance samples cannot be collected at any of the sample taps previously collected for this monitoring period.

All forms can be found at: Ohio EPA Lead and Copper page and submitted to this office via email.

If you have any questions concerning the requirements of this letter, please contact me at brandon.kilbarger@epa.ohio.gov or (740) 380-5421.

Sincerely,



Brandon Kilbarger
Environmental Specialist II
Division of Drinking and Ground Waters

BK/cd

cc: Guernsey County Health Department
Kendal Weisend, ORC
Brennan Dudley, Village Administrator
Robert Gerdau, Byesville WTP
Jessica Arnold, Environmental Supervisor, DDAGW-SEDO
Josh Legg, Environmental Manager, DDAGW-SEDO
Rex Hagg, DOCC, DDAGW-SEDO
Eric Hart, DDAGW-SEDO
Jodi Elam, DDAGW-CO



September 19, 2023

ACTION REQUIRED

Transmitted Electronically

Village of Byesville
Brennan Dudley, Village Administrator
221 Main Street
Byesville, OH 43723

RE: Byesville
Compliance Review
Compliance Correspondence
Drinking Water Program
Guernsey County
PWS ID: OH3001212

**Subject: Rescission of Action Level Exceedance of Lead and Copper Rule; Facility ID:
3054706**

Dear Mr. Dudley:

Your public water system was issued an Action Level Exceedance (ALE) of Lead and Copper Rule dated August 30, 2023, based upon results from the minimum number of samples required for compliance. According to Ohio Administrative Code (OAC) Rule 3745-81-86 (E), "The results of any monitoring conducted in addition to the minimum requirements of this rule shall be considered by the public water system and the director in making any determinations, i.e., calculating the ninetieth percentile lead or copper level, under rule 3745-81-80 of Administrative Code."

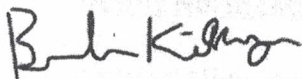
Additional samples were collected during the June 1 – September 30, 2023, monitoring period and the calculated ninetieth percentiles for lead and copper were below action levels. Therefore, the August 30, 2023, ALE has been rescinded and any requirements referenced within do not need to be completed.

Lead Public Notification:

Pursuant to Ohio Administrative Code (OAC) 3745-81-85(C)(1)(c), a second lead public notification shall be issued at the end of the monitoring period with updated results. Please issue a revised lead public notification immediately and submit a completed verification form and copy of the lead public notice to this office.

If you have any questions concerning the requirements in this letter, please contact me at brandon.kilbarger@epa.ohio.gov or (740) 380-5421.

Sincerely,



Brandon Kilbarger
Environmental Specialist II
Division of Drinking and Ground Waters

BK/cd

cc: Guernsey County Health Department
Kendal Weisend, ORC
Brennan Dudley, Village Administrator
Jessica Arnold, Environmental Supervisor, DDAGW-SEDO
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Rex Haggy, DOCC, DDAGW-SEDO
Eric Hart, DDAGW-SEDO
Jodi Elam, DDAGW-CO