



# COMMONWEALTH of VIRGINIA

Karen Remley, MD, MBA, FAAP  
State Health Commissioner

J. Wesley Kleene, PhD, PE  
Director, Office of Drinking Water

DEPARTMENT OF HEALTH  
**OFFICE OF DRINKING WATER**  
Culpeper Field Office

400 S. Main Street, 2<sup>nd</sup> Floor  
Culpeper, VA 22701  
Phone: 540-829-7340  
Fax: 540-829-7337

NOV 23 2010

## NOTICE OF VIOLATION

Subject: Loudoun County  
Water- Raspberry Falls  
PWSID No. 6107601

Mr. Tom Bonacquisti  
Water Quality Program Manager  
Loudoun Water  
PO Box 4000  
Ashburn, VA 20146

Dear Mr. Bonacquisti:

The Virginia Department of Health (VDH) has performed a Groundwater Under the Direct Influence of Surface Water (GUDI) determination for Well PW-1 using raw water sample results for the six-month period ending October 31, 2010. The results were described to you in a telephone conversation with Bob Edelman, PE, District Engineer, on November 16, 2010. A raw water results summary sheet and GUDI Determination Review Sheet are attached.

These latest records and laboratory testing results indicate that Well PW-1 is under the direct influence of surface water and, therefore, you may be in violation of the *U. S. Environmental Protection Agency Surface Water Treatment Rule* and *12VAC5-590-430* of the *Virginia Waterworks Regulations*. A water source is determined to be GUDI if more than 10% of the total coliform MPN results exceed 100 cfu/100 mL. The six-month period includes 40 MPN samples, and five (5) MPN samples exceeded 100 cfu/100 mL, resulting in 12.5% MPN samples exceeding 100 cfu/100 mL.

Accordingly, we request that you take immediate action to address this situation. Actions which should be considered:

- Discontinue use and disconnect permanently the surface influenced source (Loudoun Water has indicated in conversation with Mr. Edelman that the well was shut down on 11/16/2010).
- Install filtration and disinfection treatment for the GUDI source within 18 months of this notice, or by May 23, 2012, in accordance with *12VAC5-590-420* of the *Waterworks Regulations*.
- Develop new or replacement sources.
- Connect to another waterworks such as Town of Leesburg or Selma Estates.

Mr. Tom Bonacquisti  
Page 2 of 2

Subject: Loudoun County  
Water- Raspberry Falls  
PWSID No. 6107601

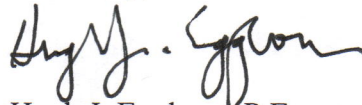
Please notify this office in writing no later than 12/3/2010 of your intentions with regard to discontinuing use of this GUDI source, or the installation of acceptable filtration and disinfection treatment. If you cannot immediately discontinue use of this GUDI source, you must initiate the attached interim requirements, and we will coordinate those requirements and issuance of a Boil Water Notice with you.

If you dispute the Office's determination that your groundwater source is under the direct influence of surface water, you have the right to an informal fact finding conference (IFFC), pursuant to *VA Code § 2.2-4019*, to present evidence and argument to refute this conclusion. Please contact this Office within 30 days of the date of this letter if you wish us to schedule an IFFC.

We acknowledge the actions Loudoun Water has taken at Raspberry Falls to protect public health prior to this determination and to provide the water quality information requested by this office necessary to make this determination. Our records indicate there has never been a positive distribution system coliform sample since the establishment of this public waterworks. In addition, LW improved the disinfection process at Well PW-1 in the Fall of 2009 by ensuring that 4-log inactivation of viruses was achieved in accordance with the recently established Groundwater Rule.

If you have any questions, please contact me or Robert D. Edelman, P.E., District Engineer at 540-829-7340.

Sincerely,



Hugh J. Eggborn, P.E.  
Engineering Field Director

cc Loudoun County Health Department, ATTN – Dr. David Goodfriend  
Bruce Ringrose, PE, Loudoun Water, Manager of Community Systems  
VDH - Richmond Central