



REGION 8
DENVER, CO 80202

April 25, 2025



Ref: 8ECA-W-S

SENT VIA EMAIL
DIGITAL DELIVERY RECEIPT REQUESTED

Cottonwood Homeowners Association
c/o Mary Viktorin, President
Cottonwood Acres Public Water System

Subj: Administrative Order Addendum, Cottonwood Homeowners Association regarding Cottonwood Acres Public Water System, PWS ID 5601233, Docket # **SDWA-08-2025-0003**

Dear Ms. Viktorin:

This is an Addendum to the Administrative Order (Order) issued to Cottonwood Homeowners Association and Mary Viktorin (Respondents) on December 4, 2024, concerning the public water system referenced above (the System). The purpose of this letter is to approve the following schedule for the Respondents to take steps to come into consistent compliance with the uranium maximum contaminant level (MCL). As provided in paragraph 8.c of the Order, each milestone and deadline specified below is an enforceable provision of the Order.

<u>Milestone</u>	<u>Deadline</u>	<u>Projected Cost</u>
Submit AVI engineering consultant's Project Cost (Itemized by Phase 1 Task) to the EPA	Completed	--
Form Improvement & Service District *	Completed	--
Conduct any necessary election for forming Improvement & Service District*	Completed	--
Complete Facility Mapping (water service lines, valves, shut-offs, and buried cables). Include septic tanks/leach fields in mapping if possible. Provide a copy of the completed facility mapping to EPA.	Completed	--

Complete Capacity Assessment to Demonstrate Capacity Development and submit to the appropriate state agency. Provide EPA with a copy of the submission.	Completed	TBD
Complete Needs Survey and Application for Intended Use Plan 2026 Funding Priority List and submit to the appropriate state agency. Provide EPA with a copy of the submission.	Completed	TBD
Submit State Revolving Loan Application to the appropriate state agency.* Provide EPA with a copy of the submission.	120 days prior to the first State Land and Investment Board meeting for the 2026 funding period	TBD
Submit an updated schedule to the EPA for completion of final design, permitting, construction, and construction completion of Respondents' December 5, 2024 plan for incorporation as a future addendum to the Order.	Within 30 days after State Revolving Loan Application approval	\$708,728
If water from SP02 is used for drinking water, notify the EPA.	Within 24 hours of beginning to supply water from SP02 for human consumption (which includes drinking, bathing, showering, cooking, dishwashing, or maintaining oral hygiene)	N/A

“TBD” indicates to be determined.

Please note that the last milestone in this schedule is for the Respondents to submit an updated schedule. The updated schedule will need to set a deadline for achieving consistent compliance with the maximum contaminant level (MCL) for uranium. This should be within 6 months of the project start date per paragraph 8.b of the Order unless EPA approves a different deadline.

Within 10 calendar days of completing all steps included in the above schedule, the Respondents are required to notify the EPA. The EPA is authorized to seek penalties if these deadlines are not met. If Respondents have a reasonable basis to believe they may be unable to meet any deadline in the schedule, they must notify the EPA well in advance of the relevant deadline. The EPA may, in its discretion, consider granting an extension.

As a reminder, per paragraph 8.d of the Order, within 90 calendar days after receipt of this letter, Respondents will be required to begin providing the EPA with quarterly reports on their progress in meeting the deadlines in the schedule.

If you have any questions or to request an informal conference with the EPA, please contact Chris Brown via email at brown.christopher.t@epa.gov, or by phone at (800) 227-8917, extension 6669, or (303) 312-6669. Any questions from an attorney for either or both Respondents should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at bearley.mia@epa.gov or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

Sincerely,

Colleen Rathbone, Manager
Water Enforcement Branch
Enforcement and Compliance Assurance Division

cc: WY DEQ/DOH (via email)
Goshen County Commissioners (mmcnamee@goshencounty.org)
EPA Regional Hearing Clerk (r8_hearing_clerk@epa.gov)
Ron Miller, Treasurer, Cottonwood Homeowners Association (email)
John Kinberg, Chief Operator (email)
Gary Childs, Contract Operator (email)
Dennis Lewis, WY DEQ District Engineer (dennis.lewis@wyo.gov)
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