



REGION 8

DENVER, CO 80202

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U.S. EPA REGION 8
HEARING CLERK

July 23, 2024

Ref: 8ECA-W-S

SENT VIA EMAIL
DIGITAL DELIVERY RECEIPT REQUESTED

Mr. Chip Marvin, Director
Squaw Creek Water District
chipmarvin@gmail.com

Subj: Emergency Administrative Order Addendum, Squaw Creek Water District
Regarding Squaw Creek Water District Public Water System, PWS WY5600737
Docket # SDWA-08-2024-0034

Dear Mr. Marvin:

This is an Addendum to the Emergency Administrative Order (Order) issued to Squaw Creek Water District on July 2, 2024. The purpose of this letter is to approve Respondent's schedule (Schedule) for coming into consistent compliance related to the confirmed *E. coli* contamination and required corrective measures of the Order. The Schedule is hereby incorporated into the Order pursuant to paragraph 20. Each milestone and deadline specified below is an enforceable provision of the Order.

<u>Milestone</u>	<u>Deadline</u>	<u>Projected Cost</u>
1. As applicable, provide daily (Monday – Friday) updates to EPA by email related to: <ul style="list-style-type: none"> 1.1. Distributing the boil water advisory and alternative water source; 1.2. Corrective actions; 1.3. The progress of disinfecting and flushing the System; and 1.4. Total coliform and chlorine residual monitoring. 	Commence 24 hours of receipt of the Emergency Administrative Order.	

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2. Post boil water advisory until notified by the EPA that you may discontinue the posting.	Completed on June 29, 2024.	
3. Provide an alternate water source until notified otherwise by the EPA.	Completed on June 30, 2024.	\$ Dependent on boil notice length
4. -Install a new pressure sensor on STO5. -Add seals to the inner tank lids to ST01, ST02, ST03, ST04. -Restored proper operation of chlorination equipment. -Restore telemetry communication between intermediate tank and booster station controls. -Tighten bolts on the well heads. -Install #24 mesh on tank vents. -Install a seal on the outer hatch cover of the lower tank. - Troubleshoot controls panel; work in progress.	Completed during July 3- July 5, 2024.	\$ 1675
5. Tank and distribution disinfection, flushing.	Completed during July 15- July 16, 2024.	\$350
6. Replace well seals on both wells.	August 31, 2024.	\$500
7. Complete repairs to control panel.	September 30, 2024.	\$2000
8. Construct new outer tank hatches for upper tanks, ST01, ST02, ST03, ST04, that are 24” above grade and fitted with seal, per sanitary survey.	October 31, 2024	\$4000
9. Notify the EPA of construction completion.	Within 5 business days following construction completion.	
10. Collect consecutive daily (one sample per day) “special purpose” total coliform samples from the distribution system until notified in writing by the EPA that consecutive daily samples may be discontinued. Email each result to the EPA immediately upon receipt of the analysis from the laboratory.	Beginning on the first date chlorine levels returned to normal following disinfection and flushing and continuing until receiving written notification from the EPA.	Dependent on how many special samples are taken. \$175 (estimate)

11. Collect weekly “special” total coliform samples (one sample per week).	The first week after being notified by the EPA that consecutive daily samples may be discontinued and continuing until receiving written notification from the EPA.	Dependent on how many special samples are taken. \$105 (estimate)
12. Resume monthly routine total coliform sampling as required by 40 C.F.R. § 141.854 to determine compliance.	After being notified by the EPA that consecutive daily samples may be discontinued.	
13. Notify the EPA of the project’s completion as required by the Order.	Within 10 calendar days of completing all aforementioned steps.	
<p>Note: If a facility (e.g., well) is taken offline and planned to be brought back online during the emergency:</p> <p>When the facility is taken offline:</p> <p>13.1.1. The System must keep the boil water advisory posted/provide an alternate water source until notified by the EPA.</p> <p>13.1.2. Disinfect and flush the System.</p> <p>13.1.3. Once the chlorine levels have dissipated or returned to normal levels, collect special daily samples until notified by the EPA.</p> <p>13.2. When the facility is reconnected:</p> <p>13.2.1. The System must repost the boil water advisory/provide an alternate water source until notified by the EPA.</p> <p>13.2.2. Disinfect and flush the System.</p> <p>13.2.3. Once the chlorine levels have dissipated or returned to normal levels, collect special daily samples until notified by the EPA.</p>		

Pursuant to paragraph 17 of the Order, Respondent is required to provide the public with an alternate potable water supply that is available at no cost to all users of the System as needed for drinking, hand washing, cooking, maintaining oral hygiene, and dish washing. Respondent shall provide at least two liters of potable water daily per person at a central location that is accessible to all persons served by the System. The alternate water supply shall be made available until Respondent receives written notification from the EPA that it is no longer necessary to supply it.

The EPA is authorized to seek penalties if these deadlines are not met. If Respondent has a reasonable basis to believe it may be unable to meet any deadline in the Schedule, Respondent must notify the EPA well in advance of the Scheduled deadline to request an extension. The EPA may, in its discretion, consider granting an extension.

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If you have any questions or wish to discuss the Order, please contact Christina Carballal via email at carballal-broome.christina@epa.gov, or by phone at (800) 227-8917, extension 6046, or (303) 312-6046. Any questions from the District's attorney 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,

Emilio Llamozas, Acting Manager
Water Enforcement Branch
Enforcement and Compliance Assurance Division

cc:

WY DEQ/DOH (via email)
Teton County Commissioners (mnewcomb@tetonwyo.org)
Emily Hanner, Clearwater Operations, Contract Operator
(clearwateroperations@gmail.com)
Keith Nelson, Squaw Creek Water District, Board Member
(keithnelson@kpunet.net)
Bradley Ellis, WY DEQ District Engineer (bradley.ellis@wyo.gov)