

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

FILED

Nov 18, 2025

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U.S. EPA REGION 8
HEARING CLERK

IN THE MATTER OF:

Rocky Mountain Rentals, Inc
and Renae Crowley

Respondents.

Lakeview Mobile Home Park
PWS ID #WY5601449

ADMINISTRATIVE ORDER

Docket No. SDWA-08-2026-0026

1. This Order is issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by section 1414(g) of the Safe Drinking Water Act (Act), 42 U.S.C. § 300g-3(g), as properly delegated to the undersigned official.
2. Rocky Mountain Rentals, Inc and Renae Crowley (Respondents) are a Wyoming corporation and individual who own and operate the Lakeview Mobile Home Park Public Water System (System), which provides piped water to the public in Campbell County, Wyoming, for human consumption.
3. The System is supplied by a groundwater source accessed via one well. The water is treated with sodium hypochlorite and then sorted in an 18,000-gallon tank.
4. The System has approximately 19 service connections used by year-round residents and regularly serves approximately 36 year-round residents. Therefore, the System is a “public water system” and a “community water system” as defined in 40 C.F.R. § 141.2 and sections 1401(4) and (15) of the Act, 42 U.S.C. §§ 300f(4) and (15).
5. Respondents are “persons” as defined in section 1401(12) of the Act, 42 U.S.C. § 300f(12), and is subject to the Act and 40 C.F.R. part 141 (Part 141). Part 141 is an “applicable requirement” as defined in section 1414(i) of the Act, 42 U.S.C. § 300g-3(i).
6. EPA promulgated the original Lead and Copper Rule (LCR), 40 C.F.R. § 141.80 *et seq.*, in 1991.
7. On January 15, 2021, EPA promulgated the Lead and Copper Rule Revisions (LCRR). On December 6, 2023, EPA published the proposed Lead and Copper Rule Improvements (LCRI). On October 30, 2024, EPA promulgated the final LCRI. 89 Fed. Reg. 86418 (October 30, 2024).

8. The LCRI modified most of the requirements in the LCRR and established a compliance date of November 1, 2027, for those provisions. The LCRI also incorporated select provisions from the 2021 LCRR, including the October 16, 2024, compliance deadline for initial service line inventories.

VIOLATIONS

9. As required by 40 C.F.R. § 141.84(a), a water system must develop a service line inventory that identifies the materials of all service lines connected to the public water distribution system. Systems were required to develop and submit an initial service line inventory by October 16, 2024, pursuant to the reporting requirements of 40 C.F.R. §§ 141.84(a)(1) and 141.90(e)(1). Respondents failed to develop and submit the System's required initial service line inventory to EPA by the October 16, 2024, deadline.
10. Failure to develop an initial inventory by October 16, 2024, requires Tier 2 Public Notification (PN) within 30 calendar days, with the public notice to be repeated every three months and for notice to remain in place for as long as the violation or situation persists, pursuant to 40 C.F.R. Subpart Q of Part 141 (Subpart Q), Appendix A. Within 10 calendar days after providing public notice, a copy of the PN and a certification of completion must be provided to the EPA. Respondents failed to provide Tier 2 PN and certify its completion to the EPA as required by Subpart Q to the persons served by the System.
11. Failure to submit an initial inventory to the EPA by October 16, 2024, requires Tier 3 PN within one year pursuant to Subpart Q, Appendix A. Within 10 calendar days after providing public notice, a copy of the PN and a certification of completion must be provided to the EPA. Respondents failed to provide a Tier 3 PN and certify its completion to the EPA as required by Subpart Q to the persons served by the System.
12. Within 30 days of completing its initial service line inventory, a water system must provide certain notification to all persons served by the water system from service connections with a lead, galvanized iron or steel requiring replacement, or lead status unknown service line. 40 C.F.R. §141.85(e)(1) and (e)(2). The System shall use the notification sent by mail or by another method approved by EPA to provide

such persons with notice of a service line that is known to or may potentially contain lead. 40 C.F.R. §141.85(e)(1) and (e)(4). Further, the notice shall include public education materials that provide the explanations and content as required by 40 CFR 141.85(e)(3). Respondents failed to provide notification to all persons served by the System from such service connections that the service line is known to contain, or has the potential of containing, lead; or such notification has failed to meet the timing, content, or delivery requirements as prescribed in 40 C.F.R. § 141.85(e).

13. A water system must make the initial service line inventory publicly available pursuant to 40 C.F.R. §141.84(a)(8). Respondents failed to make the initial service line inventory publicly available as prescribed in 40 C.F.R. §141.84(a)(8).
14. EPA is issuing this Order to address the violations enumerated above and to place Respondents on an enforceable schedule to comply with the LCRI.
15. Respondents are required to report any failure to comply with Part 141 to the EPA within 48 hours (except where Part 141 specifies a different time period). 40 C.F.R. § 141.31(b). Respondents failed to report the violations cited in paragraphs 9 through 13, above, to the EPA and therefore, violated this requirement.

ORDER

Respondents are ordered to perform the following actions upon Respondent's receipt of this Order (unless a different deadline is specified below):

16. Respondents are ordered to comply with all provisions of the Act and Part 141, including but not limited to each requirement cited above.
17. For any future violation of this Order that does not specify a reporting period, Respondents must report the violation to EPA within 48 hours of the violation occurring, as required by 40 C.F.R. § 141.31(b).
18. Within 30 days after the effective date of this Order, Respondents shall develop and submit its initial service line inventory or provide a proposed plan and schedule to develop and submit its initial lead service line inventory, as required by 40 C.F.R. § 141.84(a), to EPA. Respondents shall submit its inventory to the addresses specified in paragraph 25.

19. Within 30 days after the effective date of this Order and quarterly thereafter until the violation is resolved, Respondents shall issue Tier 2 PN for their failure to develop and submit their initial service line inventory, as required by 40 C.F.R. § 141.203. Within 10 calendar days after providing public notice, Respondents shall provide a copy of the PN and certification to the addresses specified in paragraph 25.
20. Within 30 days after the effective date of this Order, Respondents shall issue Tier 3 PN for its failure to develop and submit its initial service line inventory, as required by 40 C.F.R. § 141.204. Within 10 calendar days after providing public notice, Respondents shall provide a copy of the PN and certification to the addresses specified in paragraph 25.
21. Within 30 days of submitting the initial lead service line inventory, Respondents shall notify and provide required public education materials to all customers served by a lead service line, galvanized pipe(s) requiring replacement, or lead status unknown service line, as required by 40 C.F.R. § 141.85. Respondents shall provide information that this was accomplished to the addresses specified in paragraph 25.
22. Within 30 days of submitting the initial lead service line inventory, Respondents shall make its initial service line materials inventory publicly available, as required by 40 C.F.R. § 141.84(a)(8). Respondents shall provide information that this was accomplished by submitting appropriate documentation to the addresses specified in paragraph 25.
23. If the population or number of connections served by the System falls below 25 individuals or 15 connections, Respondents must notify the EPA in writing within 10 calendar days by submitting a completed basic information form. The form is available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#new>.
24. If Respondents (a) lease or sell the System to another person or entity, or (b) contract with or hire any other person or entity to operate the System, Respondents must, within 10 calendar days, provide a copy of this Order to the lessee, purchaser, or contractor and notify the EPA in writing of the change. In either of these circumstances, Respondents will remain obligated to comply with this Order.

25. Respondents must send all reporting and notifications required by this Order to the EPA at:

Email: R8DWU@epa.gov, and Bell.marlon@epa.gov

GENERAL PROVISIONS

26. This Order is binding on Respondents, Respondents successors and assigns and any person (*e.g.*, employee, contractor, or other agent) acting in concert with Respondents.
27. This Order does not constitute a waiver, suspension, or modification of any requirement of the Act or Part 141. Issuance of this Order is not an election by the EPA to forgo any civil or criminal action.
28. Violation of any part of this Order, the Act, or Part 141 may subject Respondents to an administrative civil penalty of up to \$71,545 (as adjusted for inflation) per day of violation, a court injunction ordering compliance, or both. 42 U.S.C. § 300g-3(g)(3); 40 C.F.R. part 19; 90 Fed. Reg. at 1375 (January 8, 2025).
29. Respondents may seek federal judicial review of this Order pursuant to section 1448(a) of the Act, 42 U.S.C. § 300j-7(a).

Issued: November 18, 2025.

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