



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
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Phone 800-227-8917  
<http://www.epa.gov/region08>

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Ref: 8 ENF-W

CERTIFIED MAIL #  
RETURN RECEIPT REQUESTED

Ronald Quanbeck, Registered Agent  
Emmanuel Lutheran Church of Shepherd, Montana  
P.O. Box 66  
Shepherd, MT 59079

Re: Violation of Administrative Order  
Docket No. SDWA-08-2007-0016  
PWS ID # MT0003836

Dear Mr. Quanbeck:

On March 23, 2007, the US Environmental Protection Agency (EPA) issued an Administrative Order, Docket No. SDWA-08-2007-0016, ordering Emmanuel Lutheran Church of Shepherd, Montana (Emmanuel Lutheran Church), to comply with various regulations issued by EPA under the Safe Drinking Water Act (SDWA), 42 U.S.C. section 300f et seq.

Our records indicate that Emmanuel Lutheran Church (Respondent) is in violation of the Administrative Order (the Order). Among other things, the Order included the following requirement (quoted from items 1 and 2 of the Order section on page 5 of the Order):

1. Upon the effective date of this Order, Respondent shall monitor the water for total coliform monthly as required by ARM 17.38.215(1)(b) to determine compliance with the total coliform maximum contaminant level (MCL) appearing at ARM 17.38.207(1) and 40 C.F.R. § 141.63(a)(2). Respondent shall report results to EPA and the State within ten days following the end of each monitoring period, as required by 40 C.F.R. § 141.31(a).

Respondent did not monitor for total coliform bacteria in August 2007.

2. Upon the effective date of this Order, Respondent shall comply with 40 C.F.R. § 141.21(g)(2) by reporting any failure to comply with coliform

monitoring requirements under 40 C.F.R. § 141.21 to EPA and the State within ten days after the System discovers the violation.

Respondent failed to report to EPA the noncompliance detailed in part 1 above, failure to monitor for total coliform bacteria.

EPA is considering additional enforcement action as a result of Emmanuel Lutheran Church's non-compliance with the Order. Violating an Administrative Order may lead to (1) a penalty of up to \$32,500 per day per violation of the Order, and/or (2) a court injunction ordering compliance.

If you have any questions or wish to have an informal conference with EPA, you may contact Kimberly Pardue Welch at 1-800-227-8917, extension 6983 or (303) 312-6983. If you are represented by an attorney or have legal questions, please contact Peggy Livingston, Enforcement Attorney at (303) 312-6858 or at the following address:

Peggy Livingston  
Enforcement Attorney  
U.S. EPA, Region 8 (8-ENF-L)  
1595 Wynkoop Street  
Denver, Colorado 80202-1129

We urge your prompt attention to this matter.



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Lisa Kahn, Team Leader  
Drinking Water Enforcement Program  
Office of Enforcement, Compliance  
and Environmental Justice

cc: Sharon Wolske, Emmanuel Lutheran Church  
John Arrigo, MDEQ  
Kate Miller, MDEQ

