



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8ENF-W

CERTIFIED MAIL LETTER
RETURN RECEIPT REQUESTED

SEP - 9 2008

Sublette County Commissioners
c/o William Cramer, Chairman
P.O. Box 250
County Courthouse
Pinedale, WY 82941-0250

Re: Notice of Safe Drinking Water Act
Enforcement Action against
PTI Remote Site Services USA Inc.
Wyoming Lodge Crown Camp Services
PWS ID# WY5601584

Dear County Commissioners:

The Safe Drinking Water Act (SDWA) requires that the United States Environmental Protection Agency (EPA) notify locally elected officials of certain enforcement actions taken in their area.

An Administrative Order is being issued to PTI Remote Site Services USA Inc., for the Wyoming Lodge Crown Camp Services Public Water System, located in Pinedale, Wyoming. This Order requires that the public water system take measures to return to compliance with the SDWA and the National Primary Drinking Water Regulations. The violations include: failing to monitor the water quarterly for radionuclide contamination; failure to monitor for lead and copper; failure to collect monthly total coliform samples; failing to monitor the water quarterly for volatile organic contaminants; failing to monitor the water quarterly for pesticide/herbicide organic contaminants; failure to post public notice; and failing to report such violations to EPA.

For more details, a copy of the Order is enclosed for your information. **The Order does not require any response or action by the County Commission.** If you have any questions regarding this Order, please contact Shawn McCaffrey at (303) 312-6515.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane L. Sipe".

Diane L. Sipe, Director
Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

SEP - 9 2008

Ref: 8ENF-W

CERTIFIED MAIL LETTER
RETURN RECEIPT REQUESTED

C T Corporation System, Registered Agent
PTI Remote Site Services USA Inc.
1720 Carey Ave.
Cheyenne, WY 82001

Re: Administrative Order
Docket No. **SDWA-08-2008-0102**
Wyoming Lodge Crown Camp Services
PWS ID# WY5601584

Dear C T Corporation System:


Enclosed is an Administrative Order (Order) issued by the United States Environmental Protection Agency (EPA) under the authority of the Safe Drinking Water Act (SDWA), 42 U.S.C. §§ 300f *et seq.* Among other things, the Order describes how PTI Remote Site Services USA Inc. has violated the National Primary Drinking Water Regulations.

The Order is effective upon the date received. Please review the Order and within 10 days provide EPA with any information you believe EPA may not have. If you comply with the Order for at least 12 months, EPA may close the Order without further action. Failure to comply with the Order may lead to substantial civil penalties and/or a Federal court injunction ordering compliance.

To submit information or request an informal conference with EPA, please contact Shawn McCaffrey at the above address (with the mailcode 8ENF-W) or by phone at (800) 227-8917, extension 6515 or (303) 312-6515. For legal questions, the attorney assigned to this matter is Jean Belille, who can be reached at the above address (with the mailcode 8ENF-L) or by phone at (800) 227-8917, extension 6556 or (303) 312-6556.

We urge your prompt attention to this matter.

Sincerely,


Diane L. Sipe, Director
Water Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Enclosure
Order

cc: Ron Green, President
Taras Senyuta, Environmental Coordinator
Tina Artemis, 8RC

ec: Wyoming DEQ
Wyoming DOH

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2008 SEP -9 PM 1:07

IN THE MATTER OF)
)
PTI Remote Site Services USA Inc.)
Edmonton, Canada)
)
Respondent)

ADMINISTRATIVE ORDER

Docket No. **SDWA-08-2008-0102**

1. This Order is issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) in the Public Health Service Act (as amended by and hereafter referred to as the "Safe Drinking Water Act" or the "Act"), 42 U.S.C. § 300f, as properly delegated to the undersigned officials.

2. PTI Remote Site Services USA Inc. (Respondent) is an Alaska corporation doing business in Wyoming that owns and/or operates the Wyoming Lodge Crown Camp Services Public Water System (the system), which provides piped water to the public for human consumption in Sublette County, Wyoming. The system is supplied by a groundwater source consisting of one well, and serves approximately 154 persons through 9 service connections year-round. The system is a "community" water system as defined in 40 C.F.R. § 141.2. Respondent is subject to the requirements of the Act and the National Primary Drinking Water Regulations (drinking water regulations) at 40 C.F.R. part 141.

VIOLATIONS

3. Respondent was required to initially monitor the system's water for four consecutive, quarterly samples during 2007 to determine compliance with the maximum contaminant level (MCL) for radionuclides. 40 C.F.R. § 141.26(a). Respondent sampled the water for contamination of radionuclides in the 4th (October-December) quarter of 2007, but failed to monitor the water for contamination of radionuclides during all four quarters of 2007 and, therefore, violated this requirement.

4. Respondent was initially required to monitor the system's tap water for two consecutive 6-month monitoring periods to determine compliance with the action levels for lead and copper. 40 C.F.R. § 141.86(d). Respondent monitored for lead and copper during two consecutive 6-month monitoring periods in 2007, but failed to monitor for lead and copper during the 2006 compliance period, and, therefore, violated this requirement.

5. Respondent is required to monitor the water at least once per month for compliance with the MCL for total coliform bacteria. 40 C.F.R. § 141.21(a). Respondent failed to monitor the System's water in January, February and March 2006, and February and March 2008, and, therefore, violated this requirement.

6. Respondent was required to initially monitor the system's water for four consecutive quarterly samples during 2007 to determine compliance with the MCL for volatile organic contaminants. 40 C.F.R. § 141.24(f). Respondent failed to monitor the water for contamination of volatile organic contaminants during four consecutive quarters in 2007 and, therefore, violated this requirement.

7. Respondent was required to initially monitor the system's water for four consecutive quarterly samples during 2007 to determine compliance with the MCL for pesticide/herbicide organic contaminants. 40 C.F.R. § 141.24(h). Respondent sampled the water for contamination of pesticide/herbicide organic contaminants in September 2007, but failed to monitor the water for pesticide/herbicide organic contaminants during four consecutive quarters in 2007 and, therefore, violated this requirement.

8. The law requires Respondent to notify the public of certain violations of the drinking water regulations, in the manner specified by the regulations. 40 C.F.R. § 141.201 *et seq.* Respondent failed to notify the public of the 2006 violations listed in paragraphs 4 and 5 above and, therefore, violated the requirement. Public notice for the 2007 failure to monitor radionuclides, volatile organic contaminants and pesticide/herbicide organic contaminants, and the 2008 failure to monitor total coliform violations is not yet past due.

9. Respondent is required to report any failure to comply with a coliform monitoring requirement to the EPA within 10 days after learning of the violation. 40 C.F.R. § 141.21(g)(2). Respondent failed to report to EPA total coliform monitoring violations listed in paragraph 5 above and, therefore, violated this requirement.

10. Respondent is required to report any failure to comply with any of the drinking water regulations (except where a different reporting period is specified) to EPA within 48 hours. 40 C.F.R. § 141.31(b). Respondent failed to report the violations listed in paragraphs 3, 4, 6, 7 and 8 above to EPA and, therefore, violated this requirement.

ORDER

Based on the above violations, Respondent is ordered to perform the following actions:

11. Prior to September 30, 2008 and again between October 1, 2008 and December 31, 2008, and per the regulations thereafter, Respondent shall monitor for radionuclides. 40 C.F.R. § 141.26(a).

12. During the period of June 1 through September 30, 2008, Respondent shall monitor the system's water for lead and copper by taking samples from five tap locations. Thereafter, Respondent shall monitor as required by the drinking water regulations. 40 C.F.R. § 141.86. Respondent shall report analytical results to EPA within the first 10 days following the end of each sampling period, as required by the drinking water regulations. 40 C.F.R. § 141.90(a).

13. Upon receipt of this Order, Respondent shall monitor for total coliform bacteria once per month as defined in the regulations. 40 C.F.R. § 141.21. Any violation of total coliform monitoring requirements shall be reported to EPA within 10 days after the Respondent learns of it. 40 C.F.R. § 141.21(g) 2.

14. Prior to September 30, 2008, and during the subsequent three consecutive calendar quarters, Respondent shall monitor for volatile organic contaminants. Respondent shall monitor according to the regulations thereafter. 40 C.F.R. § 141.24(f).

15. Prior to September 30, 2008, and during the subsequent three consecutive calendar quarters, Respondent shall monitor for pesticide/herbicide contamination. Respondent shall monitor according to the regulations thereafter. 40 C.F.R. § 141.24(h).

16. Within 30 days of the effective date of this Order, Respondent must provide public notice of the violations specified in paragraphs 3 through 7 above. 40 C.F.R. §§ 141.201, 141.202 and 141.205. This notice shall be given by (1) mail or other direct delivery to each customer receiving a bill and to other service connections to which water is delivered by the System; AND (2) any other method reasonably calculated to reach other persons served by the system, if they would not normally be reached by the notice, such as publication in a local newspaper; delivery of multiple copies for distribution by customers that provide their drinking water to others; posting in public places or on the Internet; or delivery to community organizations. Respondent must issue a repeat notice every three months for as long as the violation persists. Respondent shall notify the public of any future violations. Respondent shall submit a copy of the public notice to EPA within ten days of completion of the public notice. 40 C.F.R. § 141.31(d).

17. Respondent shall report analytical results to EPA within the first 10 days following the month in which sample results are received as required by the drinking water regulations. 40 C.F.R. § 141.31(a).

18. Respondent shall report any violation of the National Primary Drinking Water Regulations to EPA within 48 hours. 40 C.F.R. § 141.31(b).

19. Reporting requirements specified in this Order shall be provided by certified mail to:

U. S. EPA Region 8 (8P-W-DW)
1595 Wynkoop Street
Denver, CO 80202-1129

GENERAL PROVISIONS

20. This Order does not constitute a waiver, suspension, or modification of any requirement of the Act or drinking water regulations. Issuance of this Order is not an election by EPA to forgo any civil or criminal action.

21. Violation of any part of this Order, the Act, or the drinking water regulations may subject Respondent to a civil penalty of up to \$32,500 (as adjusted for inflation) per day of violation, 42 U.S.C. § 300g-3(g)(3); 40 C.F.R. part 19.

9 September 2008
Date

Lois M. Ross
for David J. Janik, Director
Matthew Cohn, Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

9 September 2008
Date

Diane L. Sipe
Diane L. Sipe, Director
Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice