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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

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FILED EPA REGION VIII HEARING CLERK

Ref: 8ENF-W

JUL 3 2013

## CERTIFIED MAIL LETTER RETURN RECEIPT REQUESTED

Bud Allen, Registered Agent Trapper Trails Council, Boy Scouts of America Green River Office 98 North 1<sup>st</sup> East Green River, WY 82935

Re:

Administrative Order Addendum Docket No. SDWA-08-2013-0026 Camp New Fork Public Water System PWS ID # WY5600564

Dear Mr. Allen:

Pursuant to paragraph 14 of the Administrative Order (AO) issued May 6, 2013, to Trapper Trails Council of the Boy Scouts of America (Council), this Addendum to the AO incorporates the schedule for completing actions as outlined in the May 22, 2013, letter to EPA from Jeremy Bell, Camping Director, on behalf of the Trapper Trails Council. This letter constitutes the written approval by EPA of the Council's schedule as indicated in the chart below.

The Council shall come into and remain in compliance with the MCL for total coliform bacteria no later than opening day of the first week of the 2013 summer camp season. The Council shall notify the EPA of the plan's completion within 10 days after completing all tasks included the plan and schedule required by paragraph 14 of the Order. Please be advised that the Council also must sample for the 2013 Monitoring and Reporting Requirements, dated February 8, 2013, and which include quarterly sampling for total coliform bacteria during the 2<sup>nd</sup> Quarter (April – June) and 3<sup>rd</sup> Quarter (July – September).

Please note that EPA expects this approved schedule to be met. While not creating any right to an extension, EPA may in its discretion consider granting an extension to any deadline in the schedule under limited circumstances. If unexpected events occur that are beyond the Council's control and that may prompt the Council to request an extension of these deadlines, the Council will be responsible for notifying EPA well in advance of the deadline dates. EPA will not consider extending these deadlines without a clear justification for their need. The Council must provide the following information in any request for extensions: a description of the work that has been completed and the additional work that may not be completed by the deadline dates, the unexpected events that occurred and how Respondent attempted to foresee or overcome these

obstacles, the proposed new deadline dates, and an explanation that justifies the new proposed deadline dates.

Action Completed by Date

In 2012, installed new water well #2 with pitless unit, pitless unit on existing well #1, well house with chlorinators (one for each well), 30,000 gallon finished water storage tank, and booster pump system.  - Permit to Construct received  - Construction completed  - Adjustment of system controls	September 16, 2011 August 20, 2012 September 10, 2012
- Certification of Completion     Received on-site training of new public water system for owners and operators.	October 26, 2012 September 10, 2012
3. Receive Water Distribution Operator certification (#131013), Utah Division of Drinking Water	April 11, 2013
4. Attend Small Water Systems training, Casper College, Thermopolis, WY.	April 16, 2013
<ol> <li>Assess camp, inspect water system (storage and distribution), activate source and treatment and disinfect and flush system.</li> </ol>	May 11, 2013
6. Collect 2 source water total coliform samples, one from each of well, prior to opening for the 2013 camp season.	May 14, 2013
7. Receive confirmation from lab that source water total coliform sample results are safe.	May 20, 2013
8. Receive WARWS technical assistance and on-site training for camp staff and operator to include overview of system operation and disinfection, sampling techniques and sample locations. Request additional technical assistance, if needed, during the 2013 camp season.	June 5, 2013
9. Come into and remain in compliance with total coliform MCL prior to but no later than opening day of the first week of the 2013 camp season.	June 17, 2013
<ol><li>Test chlorine residual each day and record on-site.</li></ol>	Upon receipt of Addendum

Consistent with paragraph 14 of the AO, the "Completed by Date" deadlines above are now enforceable requirements of the AO.

Please be advised that the Council is required to comply with all provisions of the AO. Penalties for failing to comply are set forth in the Order. If you have any questions concerning this

Addendum, please contact Jill Minter at (800) 227-8917, extension 6084 or (303) 312-6084. If the Council is represented by an attorney, please ask your attorney to call Dana Stotsky at the above 800 number, extension 6905, or at (303) 312-6905.

Sincerely,

James H. Eppers, Supervisory Attorney

Legal Enforcement Program

Office of Enforcement, Compliance

and Environmental Justice

Amuro Palomares, Director

Water/Technical Enforcement Program

Offige of Compliance, Enforcement,

and Environmental Justice

cc: Tina Artemis, EPA Regional Hearing Clerk

Allen Endicott, Scout Executive, Trapper Trails Council, Boy Scouts of America Jeremy Bell, Camping Director and Operator, Camp New Fork Public Water System WY DEQ/DOH (via email)

Thea Koci, Special Use Permits, Bridger-Teton National Forest