



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 W. 15th STREET, SUITE 3200
HELENA, MONTANA 59626

2010 MAY 11 AM 8:26

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EPA REGION VIII
HEARING CLERK

Ref: 8MO

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Beverly Madsen, Chairwoman
Board of Trustees
Luccock Methodist Church Camp
P.O. Box 1262
Livingston, MT 59047

Re: Violation of Administrative Order
Docket No. SDWA-08-2009-0017
Luccock Methodist Church Camp
Public Water System
PWS ID # MT000282

Dear Mrs. Madsen:

On July 28, 2009, the US Environmental Protection Agency (EPA) issued an Administrative Order, Docket No. SDWA-08-2009-0017, ordering the ten Trustees (Respondents) of the Luccock Methodist Church Camp (the Camp) to comply with various regulations issued by EPA under the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300f et seq.

Our records indicate that the Camp is in violation of the Administrative Order (the Order). Among other things, the Order included the following requirements (quoted from items 10, 12 and 14 of the Order section on page 3 of the Order):

1. Upon receipt of this Order, Respondents shall monitor for total coliform bacteria monthly ARM 17.38.215(1)(b).

Respondents failed to monitor for total coliform in October 2009.

2. Within 30 days of the effective date of this Order, Respondents must provide public notice of the violations as specified in paragraphs 4, 5, and 6. 40 C.F.R. §§ 141.201, et seq. Respondents shall submit a copy of the public notice to EPA and the State within ten days of completion of the public notice. 40 C.F.R. § 141.31(d). This notice shall be given by (1) posting the notice in conspicuous locations throughout the distribution system frequented by persons served by the system OR (2) by mail or direct delivery to each customer and service connection; AND (3) any other method reasonably calculated to reach other persons served by the system if they would not

normally be reached by the notice required above, such as publication in a local newspaper or newsletter distributed to customers; use of E-mail to notify employees or students; or delivery of multiple copies in central locations. If the public notice is posted, the notice must remain in place for as long as the violation or situation persists, but for no less than seven days. The public water system must repeat the notice every three months as long as the violation or situation persists.

EPA has not received the public notice required by the Order. Please complete the public notice, including information on the October 2009 violation, and submit a copy to EPA and the State immediately.

3. Respondents shall report any violation of the total coliform monitoring requirements to EPA and the State within ten days after Respondents learn of it. 40 C.F.R. § 141.21(g)(2).

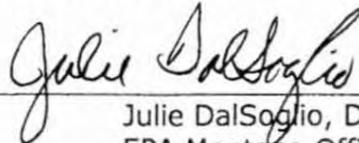
Respondents failed to report to EPA and the State the failure to monitor for total coliform violation in October 2009.

EPA is considering additional enforcement action, including assessment of penalties, as a result of the ongoing non-compliance with the Order detailed above. Violating an Administrative Order may lead to (1) a penalty of up to \$37,500 per day per violation of the Order, and/or (2) a court injunction order compliance.

If you have any questions or wish to have an informal conference with EPA, you may contact Sienna Paquin at (406)457-5026 (toll free:1-866-457-5026, ext. 5026) or Marc Weiner, Enforcement Attorney, at 1-800-227-8917, extension 6913 or (303) 312-6913, or at the following address:

Marc Weiner
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.



Julie DalSoglio, Director
EPA Montana Office

cc: John Arrigo, MT DEQ
Shelley Nolan, MT DEQ
Tina Artemis, EPA Regional Hearing Clerk