



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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

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Ref: 8 ENF-W

JUN 19 2008

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Jim Hudson  
Hudson Trusts, LLP  
808-106 Avenue NE #104  
Bellevue, WA 98004

Re: Violation of Administrative Order  
River Grove Estates Trailer Park  
Docket No. SDWA-08-2007-0045  
PWS ID # MT0000123

Dear Mr. Hudson:

On July 2, 2007, the US Environmental Protection Agency (EPA) issued an Administrative Order, Docket No. SDWA-08-2007-0045, ordering Hudson Trust, LLP, (Respondent) as owner of the River Grove Estates Trailer Park public water system, 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 Hudson Trusts, LLP, is in violation of the Administrative Order (the Order). Among other things, the Order included the following requirement (quoted from item 10 of the "Order" section on page 10 of the Order):

1. Upon the effective date of this Order, Respondent shall monitor the water for total coliform as required by 40 C.F.R. § 141.21(a) to determine compliance with the total coliform MCL appearing at 40 C.F.R. § 141.63. Respondent shall report results to EPA and the State within 10 days following the end of each monitoring period, as required by 40 C.F.R. § 141.31(a).

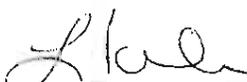
Respondent failed to monitor for total coliform in March and April 2008. Respondent did however, report noncompliance with the total coliform monitoring requirements to EPA and the State as soon as the violations were discovered, and explained how the water system's operator quit without notice.

EPA is considering additional enforcement action as a result of the 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 who has questions, please ask your attorney to contact Amy Swanson, Enforcement Attorney, at 1-800-227-8917, extension 6906 or (303) 312-6906 or at the following address:

Amy Swanson  
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:

John Arrigo, MDEQ  
Shelly Nolan, MDEQ  
Bernard F. Hubley, Hughes, Kellner, Sullivan & Alke, PLLP

