



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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www.epa.gov/region08

2019 MAY 16 PM 12:44

MAY 16 2019

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EPA REGION VIII
HEARING CLERK

Ref: 8ENF-WSD

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Holli M. Jones, Registered Agent
Meadowlark Lake Lodge, LLC
7558 US Hwy 16
Buffalo, Wyoming 82834

Re: Administrative Order issued to Meadowlark Lake Lodge, LLC regarding Meadowlark Lake Lodge Public Water System, PWS ID # WY5600688, Docket No. **SDWA-08-2019-0019**

Dear Ms. Jones:

Enclosed is an Administrative Order (Order) issued by the United States Environmental Protection Agency under the authority of section 1414(g) of the Safe Drinking Water Act, 42 U.S.C. § 300g-3(g). Among other things, the Order alleges that Meadowlark Lake Lodge, LLC (Respondent), as owner and/or operator of the Meadowlark Lake Lodge Public Water System (System), has violated the National Primary Drinking Water Regulations (Drinking Water Regulations) at 40 C.F.R. part 141.

The Order is effective upon the date received. Please review the Order and within 10 business days provide the EPA with any pertinent information you believe the EPA may not have (any monitoring that may have been done but not submitted, any updates to the number of service connections and/or individuals served, *etc.*). If the EPA does not hear from the you, the EPA will assume this information is correct.

If you comply with the Order, the EPA may close the Order without further action. Failure to comply with the Order may lead to substantial civil administrative penalties and/or a federal court injunction ordering compliance.

The Small Business Regulatory Enforcement and Fairness Act (SBREFA) may apply to this situation. Enclosed is a small business information sheet, outlining compliance assistance resources available to small businesses and small governments, in case these are relevant. SBREFA does not eliminate the responsibility to comply with the Order or the Drinking Water Regulations.

If you have any questions or to request an informal conference with the EPA, please contact Steven Latino via email at latino.steven@epa.gov, or by phone at (800) 227-8917, extension 6440, or (303) 312-6440. Any questions from your attorney should be directed to Mia Bearley, Enforcement Attorney, via email at [Bearley.Mia@epa.gov](mailto: Bearley.Mia@epa.gov) or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

We urge your prompt attention to this matter.

Sincerely,



Tiffany Cantor, Chief
SDWA Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

1. EPA Region 8 Revised Total Coliform Rule Sample Siting Plan Instructions
2. Tips for WY and Tribal Systems. How to Stay in Compliance with Monitoring Requirements Sheet.

cc: WY DEQ/DOH (via email)
Big Horn County Commissioners (felix.carrizales@bighorncounty.com)
Melissa Haniewicz, EPA Regional Hearing Clerk
Wayne Jones, Administrative Contact, Meadowlake Lodge (southfork@vcn.com)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2019 MAY 16 PM 12:44

IN THE MATTER OF:)
)
Meadowlark Lake Lodge, LLC,)
Meadowlark Lake Lodge Public Water System)
PWS ID # WY5600688)
)
Respondent.)

Docket No. **SDWA-08-2019-0019**

EPA REGION VIII
HEARING CLERK

ADMINISTRATIVE ORDER

1. This Order is issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by section 1414(g) of the Safe Drinking Water Act (Act), 42 U.S.C. § 300g-3(g), as properly delegated to the undersigned officials.
2. Meadowlark Lake Lodge, LLC (Respondent) is a Wyoming corporation that owns and/or operates the Meadowlark Lake Lodge Public Water System (System), which provides piped water to the public in Big Horn County, Wyoming, for human consumption.
3. The System is supplied by a groundwater source accessed via one well. The water is untreated.
4. The System has approximately one service connection and/or regularly serves an average of approximately 150 individuals daily at least 60 days out of the year. Therefore, the System is a "public water system" as defined in section 1401(4) of the Act, 42 U.S.C. § 300f(4), and 40 C.F.R. § 141.2. The System is also a "transient, non-community water system" as defined in 40 C.F.R. § 141.2.
5. Respondent is subject to the Act and the National Primary Drinking Water Regulations (Drinking Water Regulations) at 40 C.F.R. part 141. The Drinking Water Regulations are "applicable requirements" as defined in section 1414(i) of the Act, 42 U.S.C. § 300g-3(i).
6. The Drinking Water Regulations include monitoring requirements. The EPA has sent Respondent annual notifications of the specific monitoring requirements that apply to the System.

VIOLATIONS

7. Respondent is required to monitor the System's water annually for nitrate at every entry point to the distribution system which is representative of each well after treatment. 40 C.F.R. § 141.23(a) and (d). Respondent failed to monitor the System's water for nitrate during 2018 and, therefore, violated this requirement. Respondent did monitor for nitrate on January 22, 2019.
8. Respondent was required to develop a written total coliform sample siting plan that identifies sampling sites and a sample collection schedule that are representative of water throughout the distribution system by April 30, 2017, and submit it to the EPA for review. 40 C.F.R. § 141.853(a)(1). Respondent failed to submit a sample siting plan to the EPA and, therefore, violated this requirement.

ORDER

Based on the above violations, Respondent is ordered to perform the following actions upon Respondent's receipt of this Order (unless a different deadline is specified below):

9. Respondent shall monitor the System's water annually for nitrate, in accordance with 40 C.F.R. § 141.23(a) and (d). Respondent shall report monitoring results to the EPA within the first 10 days following either (1) the month in which the result is received or (2) the end of the required monitoring period as stipulated by the EPA, whichever is shortest. 40 C.F.R. § 141.31(a). The next nitrate sample is due in 2020.

10. Within 30 days of receipt of this Order, Respondent shall develop a written total coliform sample siting plan and submit it to the EPA for review. The plan must identify sampling sites (both routine and repeat) and a sample collection schedule that is representative of water throughout the distribution system, as required by 40 C.F.R. § 141.853(a)(1). A template can be found at <https://www.epa.gov/region8-waterops/revised-total-coliform-rule-sample-siting-plan>.

11. This Order shall be binding on Respondent, its successors and assigns, and any person (e.g., employee, contractor, or other agent) acting in concert with Respondent.

12. If Respondent (a) leases or sells the System to another person or entity, or (b) contracts with or hires any other person or entity to operate the System, Respondent shall, within ten days, provide a copy of this Order to the lessee, purchaser, or contractor and notify the EPA in writing of the change. In either of these circumstances, Respondent shall remain obligated to comply with this Order.

13. Respondent shall send all reporting and notifications required by this Order to the EPA at:

Email: R8DWU@epa.gov, and latino.steven@epa.gov

GENERAL PROVISIONS

14. This Order shall not constitute a waiver, suspension, or modification of any requirement of the Act or the Drinking Water Regulations. Issuance of this Order is not an election by the EPA to forgo any civil or criminal action.

15. Violation of any part of this Order may subject Respondent to a civil penalty of up to \$57,317 (as adjusted for inflation) per day of violation. 42 U.S.C. § 300g 3(g)(3)(A); 40 C.F.R. part 19; 84 Fed. Reg. 2056, 2059 (February 6, 2019) and 84 Fed. Reg. 5955 (February 25, 2019).

16. Respondent may seek federal judicial review of this Order pursuant to section 1448(a) of the Safe Drinking Water Act, 42 U.S.C. § 300j-7(a).

Issued: May 14th, 2019.



Amy Swanson, Chief
Regulatory Enforcement Section
Office of Regional Counsel



Tiffany Cantor, Chief
SDWA Enforcement Section
Enforcement and Compliance Assurance Division

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)

www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu

EPA's OSDBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)

www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program

<https://nationalsbeap.org>

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage

www.epa.gov/compliancec

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers

www.complianceassistance.net

EPA sponsored Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

www.epa.gov/agriculture

Automotive Recycling

www.ecarcenter.org

Automotive Service and Repair

www.ccar-greenlink.org or 1-888-GRN-LINK

Chemical Manufacturing

www.chemalliance.org

Construction

www.cicacenter.org

Education

www.campuserc.org

Food Processing

www.fpeac.org

Healthcare

www.hercenter.org

Local Government

www.lgean.org

Surface Finishing

<http://www.sterc.org>

Paints and Coatings

www.paintcenter.org

Printing

www.pncac.org

Ports

www.portcompliance.org

Transportation

www.tercenter.org

U.S. Border Compliance and Import/Export Issues

www.bordercenter.org

EPA Hotlines and Clearinghouses

www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/cate or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center

1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otag/imports or 1-734-214-4100

National Pesticide Information Center

www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - <http://nrc.uscg.mil> or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/p2/pollution-prevention-resources#ppic or 1-202-566-0799

Safe Drinking Water Hotline -

www.epa.gov/ground-water-and-drinking-water/safe-drinking-water-hotline or 1-800-426-4791

Toxic Substances Control Act (TSCA) Hotline

tsc hotline@epa.gov or 1-202-554-1404

Small Entity Compliance Guides

<https://www.epa.gov/reg-flex/small-entity-compliance-guides>

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons

www.epa.gov/resources-small-businesses/epa-regional-office-small-business-liaisons

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators

www.enycap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)

<https://nationalsbeap.org/states/list>

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal

www.epa.gov/tribalportal

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

EPA's Small Business Compliance Policy

www.epa.gov/enforcement/small-businesses-and-enforcement

EPA's Audit Policy

www.epa.gov/compliance/epas-audit-policy

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.

EPA Region 8 Revised Total Coliform Rule Sample Siting Plan Instructions

Why do I need to develop a Revised Total Coliform Rule (RTCR) Sample Siting Plan?

The purpose of this plan is to specify where in the distribution system Routine and Repeat bacteriological samples will be collected to ensure they are representative of the water quality in your system. The original Sample Siting Plan must be kept on-site for use by sampling personnel. Beginning April 1, 2016, under the RTCR, every water system will be required to collect bacteriological samples monthly.

The RTCR requires every public water system to develop an RTCR Sample Siting Plan prior to April 1, 2016. These plans are subject to review and revision by EPA. You must include the following elements in your plan:

1. A list of sampling locations: (See blank sample plan chart and example Addendum C.)
 - You will need to indicate the sites for Routine and Repeat bacteriological monitoring in your distribution system; and
 - Any source water sampling sites if subject to the Ground Water Rule.

2. A map of the distribution system showing locations of your Routine and Repeat sample sites and your source water, as described in the Sample Siting Plan. You can use a diagram, distribution system map, aerial photo, etc. Clearly indicate if there are multiple distribution systems and if those distribution systems are connected to each other. Note: You cannot use the schematic that indicates your nitrate sampling point. (See sample plan map examples Addendum B.)

Where to submit your plan:

Send a copy of your RTCR sample siting plan via mail, e-mail, or fax to:

EPA Region 8
Drinking Water Program 8WP-SDA
1595 Wynkoop Street
Denver, CO 80202
Attn: RTCR Rule Manager
Fax: (877) 876-9101
Email: R8DWU@epa.gov

How to choose a laboratory:

Not all laboratories have been approved and certified to analyze for all the required drinking water contaminants. You must send your samples to a laboratory that is certified for the specific samples that you are submitting. For a list of certified labs, visit the EPA Region 8 website: <https://www.epa.gov/region8-waterops/general-sampling-information> and click the certified lab link.

General Requirements

Process for selecting sample sites and rotation:

Review the layout of your distribution system and choose RTCR sample sites that will represent each area of the distribution system; if sampled on a monthly rotating basis throughout an entire year or open season. Be sure to take into account non-permanent sources (seasonal or interim). These sources need to be represented within your siting plan. If your water system has multiple (completely separated) distribution systems, you must select sample sites within each separate distribution system for each month you are serving water to the public. If you serve more than 4,901 people (collect 6 or more samples per month) you cannot collect all the samples on the same day. They must be collected at regular intervals throughout the month [40 CFR 141.853(a)(2)].

The Sample Siting Plan may need to be updated periodically to account for system changes (such as population changes, new housing or commercial development, new sources, change in operating season, change in treatment, etc). The plan should be reviewed annually and must be available during your sanitary survey to incorporate any changes. Submit any revisions to the EPA regional office as soon as they occur.

Routine Monitoring Requirement

Unless otherwise specified in your monitoring and reporting requirements, most systems will be placed on the monitoring schedule seen in **Addendum A** of this document.

Refer to the charts in Addendum B as examples for formatting the Sample Siting Plan. The following must be included in the plan (a blank chart is in Addendum C):

- Routine sampling location(s);
- Repeat sampling locations (only used if your Routine sample is TC+);
- Ground Water Rule (GWR) source sample location(s) for systems using groundwater sources. (Triggered GWR source sample(s) are only required if your Routine sample result is TC+. You must sample every groundwater source in use at the time of the TC+ Routine sample.)

Repeat Monitoring

After April 1, 2016, under the RTCR, systems must collect no fewer than **three** Repeat samples for each TC+ Routine sample. This requirement will apply to all systems.

- All Repeat samples need to be taken within 24 hours of notification of a TC+ Routine sample. If you cannot make this timeframe, you must contact EPA Region 8 within 24 hours to request an extension;
- One Repeat sample is required to be taken from the same tap as the original TC+ sample;
- One Repeat sample must be taken at a tap within five service connections upstream of the original TC+ Routine sample, and one must be taken at a tap within five service connections downstream of the original TC+ Routine sample.

Take note of your Routine sample locations. Can you take proper Repeat samples based on your current choices of Routine sampling sites? If not, you will need to reevaluate your Routine sites and choose another location. If you do not have a distribution system (i.e., hand pump),

upstream and downstream locations may not exist. In this case, you must collect multiple samples at the original location to count as Repeat samples.

Follow this same format of choosing representative Routine and Repeat sample locations (as shown in Addendum B) but expand as necessary if your system is required to take more than one sample per month (see Example #2). Seasonal systems only have to sample during their operating season (see Example #2).

Submitting Samples to the Laboratory:

- In order for EPA to confirm the locations of your samples and the types of samples (Routine, Repeat or Special), EPA encourages you to submit additional details about the sampling locations of your RTRC samples to the lab. Along with the lab's chain of custody form, you can use the "Source Water Sampling-Triggered Source Monitoring Sample Collection and Reporting Form" found on the EPA Region 8 website at: <https://www.epa.gov/region8-waterops/revise-total-coliform-rule-lab-sampling-form>

E. coli Testing and E. coli MCL Compliance Determination

Any TC+ sample result must automatically be analyzed for *E. coli* (EC) by your lab. Any EC+ Repeat sample or any TC+ Repeat sample following an EC+ Routine sample constitutes an *E. coli* MCL violation. All *E. coli* MCL violations are situations that require you to contact EPA Region 8 immediately and distribute public notice including a boil water order to your customers.

Groundwater source sampling:

Triggered Source Water Monitoring Requirement

Your system will need to conduct triggered source water sampling if you use a groundwater source and have a TC+ Routine sample result. Review your Monitoring and Reporting Requirements sheet to verify if source water monitoring is necessary under these conditions. If you need to conduct this monitoring, keep the following in mind:

- Within 24-hours of notification that a Routine RTRC distribution system sample is TC+, you must collect a raw water sample from each groundwater source that was in use at that time for every Routine TC+ sample (e.g., if you have three Routine TC+ samples, you will need to collect three source samples from each groundwater source). This sample must be analyzed for *E. coli*.
- You are encouraged to report this data to the lab using the "Source Water Sampling-Triggered Source Monitoring Sample Collection and Reporting Form" found on our website at:
<https://www.epa.gov/region8-waterops/wyoming-and-tribal-triggered-groundwater-source-sampling-form>
- If you need further assistance on the Ground Water Rule and the required steps after a Routine TC+ sample, please consult:
<https://www.epa.gov/region8-waterops/epa-region-8-drinking-water-unit-tech-tips-follow-unsafe-total-coliform-positive>

If the system received EPA Region 8 approval to use a sampling site that represents more than one groundwater source, please indicate that on the sample collection and monitoring form mentioned above that is submitted with your samples.

For instructions on how to properly label your RTCR and GWR samples please see the "RTCR and GWR Sample Labeling Instructions" form on the Region 8 website: <https://www.epa.gov/region8-waterops/rtcr-and-gwr-sample-labeling-instructions>

Disinfectant (chlorine) residual monitoring:

If you disinfect, your system may need to conduct residual disinfectant monitoring in the distribution system for the Disinfection By-Product Rule and/or the Surface Water Treatment Rule. Review your Monitoring and Reporting Requirements sheet to verify if disinfectant monitoring is necessary. If you need to conduct this monitoring, keep the following in mind:

- The residual disinfectant must be measured at the same time and the same location as each total coliform bacteria sample.
- These measurements must be conducted in the field by a certified operator (or under the direction of the certified operator).
- Residual disinfectant measurements must be written on each total coliform sample slip when it is submitted to the laboratory.
- Ask your laboratory to forward this information to EPA along with the sample results.

Depending on the disinfectant used in the distribution system, ensure you are measuring the proper disinfectant residual:

- If chlorine is used, the disinfectant residual must be measured as free, total, or combined chlorine
- If chloramines are used, the disinfectant residual must be measured as total chlorine

Addendum A: Required number of monthly Routine samples under the Revised Total Coliform Rule

Sampling requirements for all water systems*:

Population served/day	Routine Samples/Month	Population served/day	Routine Samples/Month
25-1,000	1	8501-12900	10
1001-2500	2	12901-17200	15
2501-3300	3	17201-21500	20
3301-4100	4	21501-25000	25
4101-4900	5	25001-33000	30
4901-5800	6	33001-41000	40
5801-6700	7	41001-50000	50
6701-7600	8	50001-59000	60
7601-8500	9	59001-70000	70

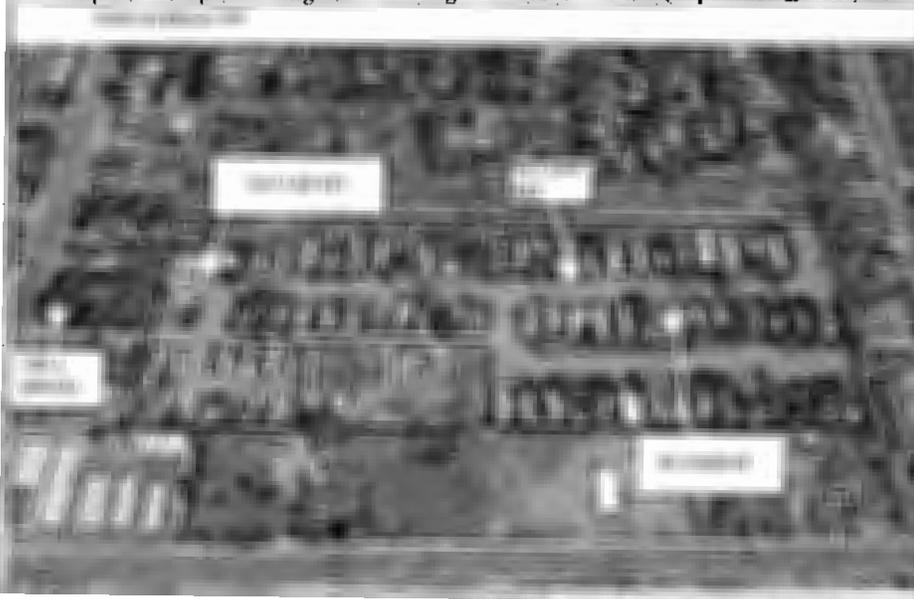
* The number of required samples may be dependent on individual wells and distribution systems under your PWS ID. For instance, if you serve 500 people per day but you have two wells that each serve completely different distribution systems you will be required to monitoring each distribution system each month.

Addendum B: Examples of RTCR Sample Siting Plans

Example #1: Chart - Single Source/Single Distribution (Population ≤ 1000; 1 sample/month)

PWS Name: EPA Water System		PWSID: WY5600xxx	1 (#) Sample(s)/month
Month	Routine Sample Location	Repeat Sample Location	GWR sample location (any sources running at the time of a routine TC+)
January	SS-2 Unit #11 (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) SS-2 Unit #14 (DIST)	
	(within 5 taps downstream)	3) SS-2 Unit #8 (DIST)	
February	SS-1 Unit # 22 (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) SS-1 Unit # 26 (DIST)	
	(within 5 taps downstream)	3) SS-1 Unit # 17 (DIST)	
March	SS-3 Unit # 4 (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) SS-3 Unit # 9 (DIST)	
	(within 5 taps downstream)	3) SS-3 Unit # 1 (DIST)	
April	SS-2 Unit #11 (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) SS-2 Unit #14 (DIST)	
	(within 5 taps downstream)	3) SS-2 Unit #8 (DIST)	
May	SS-1 Unit # 22 (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) SS-1 Unit # 26 (DIST)	
	(within 5 taps downstream)	3) SS-1 Unit # 17 (DIST)	
June	SS-3 Unit # 4 (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) SS-3 Unit # 9 (DIST)	
	(within 5 taps downstream)	3) SS-3 Unit # 1 (DIST)	

Example #1: Map for a Single Source/Single Distribution PWS (Population ≤ 1000; 1 sample/month)



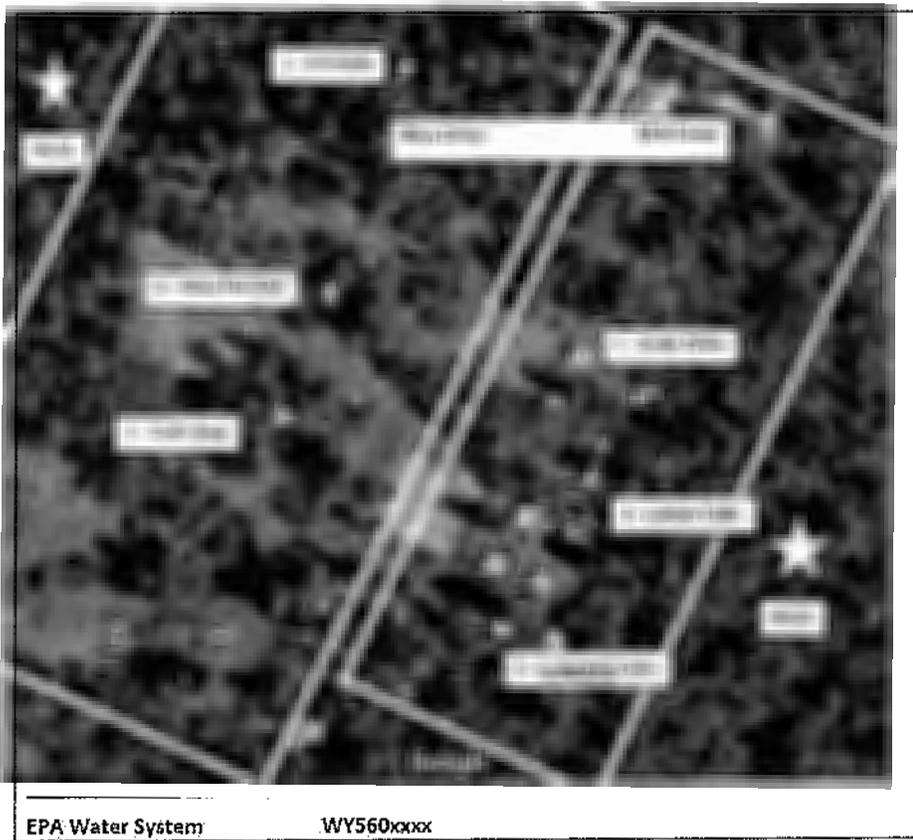
Example 2: Chart - Multiple Sources/Multiple Distribution (Population ≤ 1000; 2 samples/month)

PWS Name: EPA Water System		PWSID: WY5600xxx		2 (#) Sample(s)/month	
Month	Routine Sample Location	Repeat Sample Location	GWR sample location (any sources running at the time of a routine TC+)		
Girls Camp Distribution System					
January	CLOSED	1) (Same as routine location)			
	(within 5 taps upstream)				
	(within 5 taps downstream)				
February	CLOSED	1) (Same as routine location)			
	(within 5 taps upstream)				
	(within 5 taps downstream)				

March	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
April	CLOSED - Seasonal Startup	1) (Same as routine location)	Will complete Seasonal Startup Checklist in April
	(within 5 taps upstream)		
	(within 5 taps downstream)		
May	Juniper Cabin (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) Cedar Cabin (DIST)	
	(within 5 taps downstream)	3) Lodgepole Cabin (DIST)	
June	Lodgepole Cabin (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) Cedar Cabin (DIST)	
	(within 5 taps downstream)	3) Juniper (DIST)	
July	Cedar Cabin (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) Juniper Cabin (DIST)	
	(within 5 taps downstream)	3) Lodgepole Cabin (DIST)	
August	Juniper Cabin (DIST)	1) (Same as routine location)	GW -1 (WL01)
	(within 5 taps upstream)	2) Cedar Cabin (DIST)	
	(within 5 taps downstream)	3) Lodgepole Cabin (DIST)	
September	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
October	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
November	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
December	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
Boys Camp Distribution System			
January	CLOSED	1) (Same as routine location)	

	(within 5 taps upstream)		
	(within 5 taps downstream)		
February	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
March	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		
April	CLOSED - Seasonal Startup	1) (Same as routine location)	Will complete Seasonal Startup Checklist in April
	(within 5 taps upstream)		
	(within 5 taps downstream)		
May	Main Fountain (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Infirmary (DIST)	
	(within 5 taps downstream)	3) Craft Shop (DIST)	
June	Craft Shop (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Main Fountain (DIST)	
	(within 5 taps downstream)	3) Infirmary (DIST)	
July	Infirmary (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Craft Shop (DIST)	
	(within 5 taps downstream)	3) Main Fountain (DIST)	
August	Main Fountain (DIST)	1) (Same as routine location)	GW - 2 (WL02)
	(within 5 taps upstream)	2) Infirmary (DIST)	
	(within 5 taps downstream)	3) Craft Shop (DIST)	
September	CLOSED	1) (Same as routine location)	
	(within 5 taps upstream)		
	(within 5 taps downstream)		

Example #2: Map for a system with Multiple Sources/Multiple Distributions PWS (Population ≤ 1000 ; 2 samples/month)



Addendum C: Example form. Expand the following table as necessary. Feel free to detach and use this example form:

	PWS NAME:	PWS ID #:	
(sample/mo=)	Routine sample location	Repeat sample locations	GWR sample location (any sources in use at the time of a routine TCE)
January	1)	1) (same as routine location)	
		2)	
		3)	
February	1)	1) (same as routine location)	
		2)	
		3)	
March	1)	1) (same as routine location)	
		2)	
		3)	
April	1)	1) (same as routine location)	
		2)	
		3)	
May	1)	1) (same as routine location)	
		2)	
		3)	
June	1)	1) (same as routine location)	
		2)	

		3)	
July	1)	1) (same as routine location)	
		2)	
		3)	
August	1)	1) (same as routine location)	
		2)	
		3)	
September	1)	1) (same as routine location)	
		2)	
		3)	
October	1)	1) (same as routine location)	
		2)	
		3)	
November	1)	1) (same as routine location)	
		2)	
		3)	
December	1)	1) (same as routine location)	
		2)	
		3)	



EPA Region 8 Drinking Water Unit - Tips for WY and Tribal Systems How to Stay in Compliance with Monitoring Requirements

Check your Monitoring Schedule

- Monitoring and Reporting Requirements (Schedules) are emailed to you in February of each year. This schedule notes all contaminants your water system must monitor for, along with the required number of samples, sampling point location(s), frequency and timeframe.
- For more detailed info on your Monitoring Schedule, please refer to "*What You Need to Do Next with Monitoring Requirements*" which can be found at: <https://www.epa.gov/region8-waterops/quick-guide-drinking-water-monitoring-requirements-wyoming-and-tribal-lands-epa>
- Suggestions: Post your Monitoring Schedule on your bulletin board. Note when you must sample on your desk or wall calendar. Use a scheduler on your computer (like Outlook) to identify sampling dates and set reminders.
- If you misplace your Monitoring Schedule, a copy can be found on Drinking Water Watch (DWW) or call EPA for a replacement copy.
- Work with your Certified Lab - Once you receive your Monitoring Schedule, share it with your lab(s).
- Schedule what bottles you will need for the sampling required for the year and ask for extra Total Coliform Rule (TCR) sample bottles just in case you have a total coliform (TC) positive and need to take repeats or source samples for the Ground Water Rule. It saves time!
- Check to see if your lab will copy EPA when they email you your results. This will save you a step! But ultimately, you are responsible for making sure that EPA receives your sample results.
- Check your email for messages from EPA. Every month EPA sends out a reminder to the administrative contact (and others who request to be opted-in) of what chemical (including radiological) samples remain to be collected for the monitoring period.
- Use DWW to print out your chemical sample collection form for the pending requirements. It will contain information to help your lab understand what to test your samples for.

When to Sample and When to Report Results to EPA - ALWAYS sample as early in the month or monitoring period as you can – on a Monday if possible! This way, if a sample is lost or exceeds a holding time, you will still have time to collect another sample before the weekend or end of the month. This is a super easy way to avoid a violation.

- If the lab is not copying EPA on your sample results, send them in to EPA as soon as you receive them. This way you can avoid getting a violation for Failure to Monitor. **Tip:** TCR results are due by the 10th of the month following the month you sampled. For all other samples, send results to EPA as soon as you receive them from the lab.
- Samples results can be emailed to: r8dwu@epa.gov or faxed to: 1-877-876-9101

Where to Sample – Take your samples according to your Monitoring Schedule during the correct time period and at the correct location(s). Some samples must be collected at the entry point while others must be collected in the distribution system. Use your approved sampling/monitoring plans for distribution system samples!

Surface Water Treatment Rule – For compliance guidance, please refer to the EPA Region 8 SWTR Fact Sheet located at: <https://www.epa.gov/region8-waterops/swtr-fact-sheet-epa-region-8-may-2018>

Total Coliform Rule:

- Anytime you have a *E. coli* (EC+) sample you must call EPA IMMEDIATELY at 1-800-227-8917 and ask to speak with the RTCR Manager. Then take repeat TCR samples, as well as Ground Water Rule source sample(s) (if applicable).
- If you have a TC Positive but an E. Coli Negative, follow the 5 steps outlined in "Follow-up to an Unsafe/Total Coliform Positive Sample Tech Tip", which can be found at: <https://www.epa.gov/region8-waterops/addressing-total-coliform-positive-or-ecoli-positive-sample-results-epa-region-8>
- Avoid sampling at new faucets or newly repaired faucets, leaky faucets, outdoor faucets or those faucets connected to softeners, hot water heaters, or pressure tanks; setting down the bottle lid or exposing the inside of the lid or bottle to anything other than the sample water (do not rinse or remove powder); and rushing your sample collection. The TCR samples must be taken at specified locations throughout the distribution system as designated by your sampling plans.

Disinfection Byproducts Rule (DBPR)

- Sample according to your approved monitoring plan – you can also find what month(s) you are required to monitor and locations on your Monitoring Schedule.
- Submit your sample results and your LRAA forms (applicable to quarterly sampling) as a package as soon as you receive the results from your lab.
- Complete and submit the TTHM HAA5 OEL Calculator, which can be found on Drinking Water Online at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#dbpr2>, together with your compliance reports if the TTHM or HAA5 MCL is exceeded during any quarter.

Nitrates – This is an acute contaminant. If your nitrate sample result is over 10 mg/L you must take a confirmation sample within 24 hours and call EPA IMMEDIATELY at 303-312-6791.

Lead and Copper Rule

- Be sure to check your Monitoring Schedule, as lead and copper samples must be collected during certain months. Also, be sure to follow your lead and copper sample siting plan when collecting samples. You must collect samples from approved locations. If you don't have to sample this year, your Monitoring Schedule will tell you that.
- Always collect a first-draw sample from a tap where the water has been standing in the pipes for at least 6 hours. Avoid sample locations that have been vacant for weeks or months. The goal is to sample at homes and taps in these homes that are routinely used. Always follow your monitoring plan.

Other Rules - Check your sample results as soon as you receive them from the lab. If you see any sample has exceeded an MCL or *E. coli* positive, contact EPA immediately.

Drinking Water Online - This is where you can find the link to DWW and general info, including: emergencies, what to do if you lose pressure in your system, sanitary survey info, certified lab info, sampling and treatment techniques, reporting forms and instructions, rules and guidance and much more: Be sure to check this very helpful website: <https://www.epa.gov/region8-waterops>

Drinking Water Watch - This online system allows you view data we maintain about your water system(s). The information includes the following:

- size and type of population served.
- contact information
- water system facilities, such as wells, intakes, treatment plant, storage tanks, and distribution
- treatment used
- monitoring schedules
- sampling results reported to EPA
- violations
- plus, even more...

The Public Access Version of DWW (DWWPUB) allows anyone who is interested to view much of the available information for each regulated Public Water System (PWS) in Wyoming and within EPA R8 Tribal Lands, without the need to register or remember passwords. The Public Access Version of DWW can be found at: <https://sdwrs8.epa.gov/Region8DWWPUB/default.jsp>

Emergencies (After Hours) - If you need to report an emergency (flooding or loss of your water source, contamination in your drinking water, loss of pressure in the distribution system, or anything else that could require immediate public notice), after hours call the Region 8 Emergency Hotline at 303-293-1788. Inform the operator that you are a drinking water system in EPA Region 8.

