

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

**FILED**

May 09, 2025

8:18 am

U.S. EPA REGION 8  
HEARING CLERK

IN THE MATTER OF: )

Aladdin Water District, and )  
Wyoming Water Development Commission )

Respondents. )  
)

Aladdin Water District Public Water System )  
PWS ID # WY5601489 )

Docket No. SDWA-08-2025-0018

**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 official.
2. The Aladdin Water District and the Wyoming Water Development Commission (Respondents) are both public bodies created by or pursuant to Wyoming law that own and/or operate the Aladdin Water District Public Water System (System), which provides piped water to the public in Crook County, Wyoming, for human consumption. More specifically, the Wyoming Water Development Commission owns the well which supplies water to the Town of Aladdin, and the Aladdin Water District owns the two storage tanks in this System.
3. The System is supplied by a groundwater source accessed via one well. The water is treated with sodium hypochlorite and then stored in two 2,500-gallon storage tanks.
4. The System has approximately eight service connections and/or regularly serves an average of approximately 62 individuals daily at least 60 calendar 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. Further, the System is a non-community water system that does not regularly serve at least 25 of the same persons over six months per year and, as such, is also a “transient non-community water system” as defined in 40 C.F.R. § 141.2.
5. Respondents are a “person” as defined in section 1401(12) of the Act, 42 U.S.C. § 300f(12) and are subject to the Act and 40 C.F.R. part 141 (Part 141). Part 141 is an “applicable requirement” as defined in section 1414(i) of the Act, 42 U.S.C. § 300g-3(i).

6. Part 141 includes monitoring requirements. The EPA has sent Respondents annual notifications of the specific monitoring requirements that apply to the System.

### **VIOLATIONS**

7. Respondents are 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). Respondents failed to monitor the System's water for nitrate during 2023 and 2024 and therefore, violated this requirement.
8. Respondents are required to monitor the System's water monthly for total coliform bacteria. 40 C.F.R. §§ 141.853-858. Respondents failed to monitor the System's water for total coliform bacteria during June 2023, September 2023, October 2024, and December 2024 and therefore, violated this requirement (Note: Respondents returned to compliance when they monitored the System's water for total coliform bacteria in January, February, and March 2025).
9. If the System does not treat its water to meet at least a 4-log, 99.9% removal of viruses, Respondents are required to conduct triggered source monitoring within 24 hours of being notified that a regular, routine total coliform monitoring sample is positive for total coliform. Respondents must sample each groundwater source and have it analyzed for a fecal indicator (e.g., *E. coli*). 40 C.F.R. § 141.402. Respondents failed to monitor the System's source for a fecal indicator within 24 hours on two occasions after being notified on July 7, 2023, and October 4, 2023, that samples taken on July 6, 2023, and October 2, 2023, respectively, were analyzed as total coliform positive, and therefore violated this requirement. 40 C.F.R. § 141.402. (Note: Respondents returned to compliance when they monitored the System's source for a fecal indicator on August 10, 2023, and October 26, 2023).
10. If the System has more than one positive total coliform sample result in the distribution system within the same month or fails to take three total coliform repeat samples within 24 hours following a routine total coliform positive result, Respondents are required to conduct a Level 1 Assessment and submit it to the EPA within 30 calendar days of learning of the positive monitoring results. 40 C.F.R. § 141.859. Respondents failed to conduct a Level 1 Assessment following multiple

positive total coliform sample results in the month of October 2023, and therefore, violated this requirement. (Note: Respondent conducted a Level 1 assessment and submitted it to EPA in December 2023).

11. Respondents are required to notify the public of certain violations of Part 141 and, within 10 days after completing public notice, provide a copy of the public notice and certification to the EPA. 40 C.F.R. §§ 141.31(d) and 141.201-141.211. The violations identified in paragraphs 7, 8, and 9, above, are classified as Tier 3 violations, requiring public notices within 1 year, according to 40 C.F.R. § 141.204. Respondents failed to notify the public of the nitrate violations cited in paragraph 7, and the September 2023 total coliform bacteria violation in paragraph 8. Additionally, Respondents failed to notify the public of the nitrate violations cited in paragraph 9 except for failure to monitor the System's source for fecal indicator within 24 hours after being notified on October 4, 2023, and therefore, violated these requirements.
12. Respondents are required to notify the public of certain violations of Part 141 and, within 10 calendar days after completing public notice, provide a copy of the public notice and certification to the EPA. 40 C.F.R. §§ 141.31(d) and 141.201-141.211. The violations identified in paragraph 10, above, are classified as violations requiring Tier 2 public notice within 30 calendar days, according to 40 C.F.R. § 141.203. The EPA's records reflect that the Respondent failed to notify the public of the violation cited in paragraph 10 and failed to submit a copy of the public notice and certification to the EPA and therefore, violated this requirement.
13. Respondents are required to report any failure to comply with Part 141 to the EPA within 48 hours (except where Part 141 specifies a different time period). 40 C.F.R. § 141.31(b). Respondents failed to report the violations cited in paragraph 7 above, to the EPA and therefore, violated this requirement.
14. Respondents are required to report any violation of total coliform monitoring requirements to the EPA within 10 calendar days after discovering the violation. 40 C.F.R. § 141.861(a)(4). Respondents failed to report the violations listed in paragraphs 8 and 9 above, to the EPA and therefore, violated this requirement.

### **ORDER**

Respondents are ordered to perform the following actions upon Respondents' receipt of this Order (unless a different deadline is specified below):

15. Respondents are ordered to comply with all provisions of the Act and Part 141, including but not limited to each requirement cited above.
16. Within 30 calendar days after receipt of this Order, and as required by Part 141 thereafter, Respondents shall monitor the System's water for nitrate, in accordance with 40 C.F.R. §§ 141.23(a) and (d). Respondents shall report results to the EPA within the first 10 calendar days following the end of the required monitoring period. 40 C.F.R. § 141.31(a).
17. Respondents shall monitor the System's water monthly for total coliform bacteria. If a sample is positive for total coliform, within 24 hours of being notified of the positive result, Respondents shall collect a set of three repeat samples for each total coliform-positive sample. 40 C.F.R. § 141.853-858. Respondents shall report results to the EPA within the first 10 calendar days following the end of the required monitoring period. 40 C.F.R. § 141.31(a).
18. Within 24 hours of being notified that a routine total coliform monitoring result is positive, Respondents shall conduct source water monitoring as required by 40 C.F.R. § 141.402. If the sample is negative, Respondents shall report that result to the EPA no later than 10 calendar days after the end of the month in which the sample is taken. If a sample is *E. coli* positive, Respondents shall notify the EPA immediately for appropriate assistance 40 C.F.R. § 141.403(a)(4). Respondents shall comply with the treatment technique requirements, according to 40 C.F.R. § 141.403(a), and providing appropriate public notification pursuant to 40 C.F.R. § 141.402(g) within 24 hours as required by 40 C.F.R. § 141.202(b)(1). Thereafter, Respondents shall comply with all source water monitoring and related requirements in 40 C.F.R. § 141.402. When reporting any triggered source water sample result, Respondents shall specify that it is a triggered source water sample. Respondents shall report results to the EPA within the first 10 calendar days following the end of the required monitoring period. 40 C.F.R. § 141.31(a).

19. Following any future instances of the System (1) having more than one positive total coliform sample result (including routine and repeat samples) within the same month, (2) failing to collect three repeat samples within 24 hours following a total coliform positive sample, (3) having an *E. coli* MCL violation, or (4) has a second Level 1 Assessment trigger within a rolling 12-month period, Respondent shall conduct the appropriate level of assessment in compliance with 40 C.F.R. § 141.859.
20. Within 30 calendar days after receipt of this Order, Respondent shall notify the public of the violations cited in paragraphs 7, 8 and 9, above. Thereafter, following any future violation of Part 141, Respondent shall comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 calendar days after providing public notice, Respondent shall submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d). Templates and instructions are available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#pn>.
21. Within 30 calendar days after receipt of this Order, Respondent shall notify the public of the violation cited in paragraph 10. Within 10 calendar days after providing public notice, Respondent shall submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d). Templates and instructions are available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#pn>.
22. For any future violation of Part 141 for which this Order does not specify a reporting period, Respondents must report the violation to the EPA within 48 hours of the violation occurring, as required by 40 C.F.R. § 141.31(b). However, if Part 141 specifies a different time period for reporting the particular violation, Respondents must report the violation to the EPA within that different period.
23. If the population or number of connections served by the System at least 60 days of the year falls below 25 individuals Respondents must notify the EPA in writing within 10 calendar days by submitting a completed basic information form. The form is available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#new>.

24. If Respondents (a) lease or sell the System to another person or entity, or (b) contracts with or hires any other person or entity to operate the System, Respondents must, within 10 calendar 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, Respondents will remain obligated to comply with this Order.
25. Respondents must send all reporting and notifications required by this Order to the EPA at:

Email: [R8DWU@epa.gov](mailto:R8DWU@epa.gov), and [carballal-broome.christina@epa.gov](mailto:carballal-broome.christina@epa.gov)

### **GENERAL PROVISIONS**

26. This Order is binding on Respondents, and any person (*e.g.*, employee, contractor, or other agent) acting in concert with Respondents.
27. This Order does not constitute a waiver, suspension, or modification of any requirement of the Act or Part 141. Issuance of this Order is not an election by the EPA to forgo any civil or criminal action.
28. Violation of any part of this Order, the Act, or Part 141 may subject Respondents to a civil penalty of up to \$71,545 (as adjusted for inflation) per day of violation, a court injunction ordering compliance, or both. 42 U.S.C. § 300g-3; 40 C.F.R. part 19; 90 Fed. Reg. at 1375 (January 8, 2025).
29. Respondents may seek federal judicial review of this Order pursuant to section 1448(a) of the Act, 42 U.S.C. § 300j-7(a).

Issued: May 5, 2025.

Colleen Rathbone, Manager  
Water Enforcement Branch  
Enforcement and Compliance Assurance Division