



State of Utah

GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF DRINKING WATER
Kenneth H. Bousfield, P.E.
Director

2010 JUN -9 PM 2:13

FILED
EPA REGION VIII
HEARING CLERK

June 3, 2010

Darcy O'Connor, and
David Rochlin
EPA Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Dear Mr. O'Connor and Mr. Rochlin:

Subject: Response to EPA AO for Chekshani Cliffs, PWS#UTAH11087

Your May 17, 2010 EPA Administrative Order for Chekshani Cliffs Water System lists violations that have all returned to compliance. The following is our response to each violation listed in the May 17, 2010 Administrative Order:

1. The non-acute quality violation in November 2009, is a valid violation. The system was notified and the following month the system took the required additional routine samples. They had a satisfactory bacti record for six months following the November 2009 violation and returned to compliance in May 2010.
2. The acute total coliform violation in June 2006, is a valid violation. The system was notified of the violation and the following month the system took the required additional routine samples. They had a satisfactory bacti record for the six months following the June 2006 violation and the system returned to compliance in December 2009.
3. The failure to sample for volatile organics in 2007, is a valid failure to monitor violation. The system did begin sampling for volatile organics again in March of 2008. The system has taken three consecutive volatile organic samples and has been reduced to sampling for that contaminant group once every three years.
4. The failure to sample lead and copper for two consecutive 6-month periods in 2007 is valid. The system sampled once in 2007. After being notified of the violation, the system took two consecutive 6-month lead and copper sample sets in 2009. They returned to compliance in December 2009.

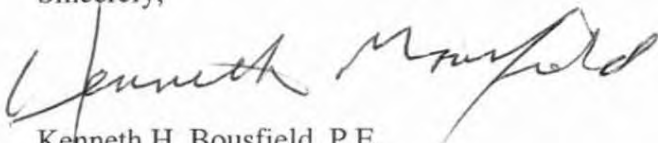
June 3, 2010

81-3 HQ 8-10010103

5. The failure to sample for gross alpha in the 3rd quarter of 2008 is not valid. Utah DDW notified Chekshani Cliffs of the requirement to sample quarterly on May 11, 2009. Therefore there was no violation for failure to sample quarterly in 2008, because there was no quarterly sampling requirement. The notification to sample quarterly in 2009 is attached.
6. The failure to sample for nitrate in the 1st quarter of 2008 is not valid. Chekshani Cliffs did sample for nitrate in the 1st quarter of 2008 for nitrate. The sample is dated March 24, 2008 and is attached.
7. The failure to report the total coliform MCL violation, and violations listed in paragraph's 5 and 6 above to the State of Utah DDW are meaningless. Chekshani Cliffs was notified by the State DDW of the above violations after the violations were determined by State DDW staff. Hence why would the system have to notify the State that they'd been notified by the State?
8. Regarding the failure to provide public notice for the above violations: The Chekshani Cliffs water system is under new management and provides timely public notice for any violations that they are notified about. The water system is currently in compliance and has no violations requiring public notice at this time.

If you have any questions on the enclosed data or violation tracking, please contact Rachael Cassady, of this office, at (801) 536-4467 or rcassady@utah.gov.

Sincerely,



Kenneth H. Bousfield, P.E.
Division Director

RC

cc: George Mason, Chekshani Cliffs
Tina Artemis, EPA Regional Hearing Clerk

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State of Utah

JON M. HUNTSMAN JR.
Governor

GARY HERBERT
Lieutenant Governor

Department of
Environmental Quality

William J. Sinclair
Acting Executive Director

DIVISION OF DRINKING WATER
Kenneth H. Bousfield P.E.
Director

May 11, 2009

Ray Ross
Checksam Cliff
88 E Fiddlers Road, Suite #A
Cedar City, Utah 84720

Dear Mr. Ross

Subject: Notice of Increased Radionuclide Monitoring

Our records indicate that the following source has a Gross Alpha result over the Maximum Contaminant Level (MCL) WS001, Homeowner Well. The MCL for Gross Alpha is 15pCi/L and the April 30, 2008 result for this source was 19.7pCi/L. This result requires increased sampling of the entire Radionuclide group in accordance with Section R309-205-7(1)(c)(v) of the Rules. As a result of this, the sampling frequency for Radionuclides at your WS001 Homeowner Well is now quarterly. It will remain quarterly until at least four quarterly samples are reported and the running annual average of those results is less than the MCL (less than 15pCi/L).

When you take these four quarterly samples for the Radionuclide group, you must request that the lab analyze for Gross Alpha, Radium-226, Radium-228, and Uranium (as part of the initial sampling requirements for the Radionuclide group in section R309-205-7(1)(b) of the rules). In order to determine compliance with the Radionuclide group, we need individual results for all four of those contaminants. Please clearly identify with the laboratory that the Radionuclide samples for this requirement are for your WS001, Homeowner Well.

An updated monitoring schedule for your system has been enclosed. We will expect you to become current with the increased sampling for Radionuclides by September 30, 2009. If you have any questions, please contact Rachael Cassady, at 801-536-4467 or rcassady@utah.gov.

Sincerely,

Patti Fauver
Rules Program Manager

RC
Enclosures
cc

Southwest Utah Public Health Department



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Document Date 05/11/2009

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Chemtech-Ford Laboratories

Certificate of Analysis

Lab No.: 08 03515
Lab Group No.: 89721

Name: Central Iron County Water Conservancy
Sample Site: District
Sample ID: Chekshani Cliffs
System No: 08 03515
Sample Type: 11085
Drinking Water

Sample Date: 3/24/2008 2:30 PM
Receipt Date: 3/25/2008 9:30 AM
Sampler: CLIENT
Sample Source:
Project: Chekshani Cliffs

Parameter	Sample Result	Minimum Reporting Limit	Units	Method	Analysis Date	Analysis Time	Analyst Initials	Flag
Group A - Inorganic								
Nitrate as N, IC	70	0.1	mg/L	EPA 300.0	3/26/2008	8:15	TSM	
Nitrite as N, IC	ND	0.1	mg/L	EPA 300.0	3/26/2008	8:15	TSM	
Sulfate, IC	962	5	mg/L	EPA 300.0	3/27/2008	13:00	TSM	
Group E - Radiochemicals								
Radium 228	0.9		pCi/L	EPA 904.0	4/21/2008	9:21	UL	O
Radium 228 LLD	1.0		pCi/L	EPA 904.0	4/21/2008	9:21	UL	O
Radium 228 Variance	0.5		pCi/L	EPA 904.0	4/21/2008	9:21	UL	O
Group P - Volatile Organic Compounds								
1,1,1,2-Tetrachloroethane	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,1,1-Trichloroethane	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,1,2,2-Tetrachloroethane	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,1,2-Trichloroethane	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,1,2-Trichlorotrifluoroethane	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,1-Dichloroethane	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,1-Dichloroethylene	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,1-Dichloropropene	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,2,3-Trichlorobenzene	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,2,3-Trichloropropane	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,2,4-Trichlorobenzene	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,2,4-Trimethylbenzene	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,2-Dichlorobenzene	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,2-Dichloroethane	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,2-Dichloropropane	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,3,5-Trimethylbenzene	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,3-Dichlorobenzene	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,3-Dichloropropane	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
1,4-Dichlorobenzene	ND	0.5	ug/L	EPA 524.2	3/26/2008	9:05	RB	
2,2-Dichloropropane	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
2-Chlorotoluene	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	
4-Chlorotoluene	ND	1	ug/L	EPA 524.2	3/26/2008	9:05	RB	

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Murray UT 84107
801-362-7299 Office
801-262-7378 Fax

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