



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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DENVER, CO 80202-1123  
Phone 800-227-8917  
<http://www.epa.gov/region08>

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EPA REGION VIII  
HEARING ROOM

Ref: 8ENF-W-SD

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Donna H. Shepherd, Registered Agent  
SSDA, LLC  
1055 Gregory Lane  
P.O. Box 4338  
Jackson, Wyoming 83001

Re: Administrative Order Violation, Snake River Mobile Home Park Public Water System,  
PWS ID# WY5600214, Docket No. **SDWA-08-2017-0037**

Dear Ms. Shepherd:

On September 26, 2017, the U.S. Environmental Protection Agency issued an Administrative Order (Order), Docket No. SDWA-08-2017-0037, directing SSDA, LLC (Company), referenced in the Order as the Respondent, as owner/operator of the Snake River Mobile Home Park, to comply with various drinking water regulations issued by the EPA under the Safe Drinking Water Act (SDWA), 42 U.S.C. section 300f *et seq.*

Our records indicate that the Company is in violation of the Order. Among other things, the Order included the following requirements (quoted from paragraphs 14 and 18 on pages 2 and 3 of the Order), which have not been fulfilled:

- Respondent shall monitor the System's water for nitrate as required by the Drinking Water Regulations. 40 C.F.R. § 141.23.
- Within 30 days after receipt of this Order, Respondent shall certify to the EPA that the 2014, 2015, and 2016 CCRs have been distributed to the System's customers. Thereafter, Respondent shall prepare and distribute annual CCRs and provide certifications as required by 40 C.F.R. §§ 141.151-141.155.

The Company is required to monitor quarterly for nitrate and did not monitor for nitrate during the 3<sup>rd</sup> Quarter 2017, 3<sup>rd</sup> Quarter 2018, and 2<sup>nd</sup> Quarter 2019. The Company also was late in submitting the 2018 Consumer Confidence Report (CCR) certification to the EPA.

The Company must complete the following: 1) monitor the System's water quarterly for nitrate and 2) for the 2019 CCR, after preparing and distributing the CCR by July 1, 2020, also provide the EPA with the annual CCR certification no later than October 1, 2020.

Enclosed is a fact sheet to assist you in addressing the outstanding monitoring violation.

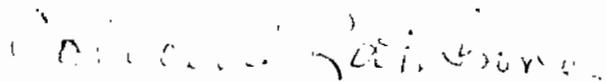
**The EPA is considering additional enforcement action as a result of non-compliance with the Order.** Violating the Order may lead to (1) a penalty of up to \$57,317 per day per violation of the Order, and/or (2) a court injunction ordering compliance.

If you have any questions, please contact Jill Minter at (303) 312-6084 or (800) 227-8917 extension 312-6084. Any questions from your attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, at (800) 227-8917, extension 6554, or (303) 312-6554, or by email at [bearley.mia@epa.gov](mailto:bearley.mia@epa.gov). or at the following address:

Mia Bearley, Senior Assistant Regional Counsel  
U.S. EPA, Region 8 (8ORC-R)  
1595 Wynkoop Street  
Denver, Colorado 80202-1129

We urge your prompt attention to this matter.

Sincerely,



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

Enclosure

cc: WY DEQ/DOH (via email)  
Teton County Commissioners ([mnewcomb@tetonwyo.org](mailto:mnewcomb@tetonwyo.org))  
Melissa Haniewicz, EPA Regional Hearing Clerk  
Scott Shepard, Administrative Contact, Snake River MHP ([scott@scottsr.com](mailto:scott@scottsr.com))  
Henley West, Office Manager, Snake River MHP ([henley@scottsr.com](mailto:henley@scottsr.com))  
Casey West, Manager and Operator, Snake River MHP Water System ([caseyjwest@gmail.com](mailto:caseyjwest@gmail.com))  
Vince Roux, Designated Operator, Snake River MHP Water System ([vince@y2consultants.com](mailto:vince@y2consultants.com))  
Alan Bybee, Snake River MHP ([a.bybee@bresnan.net](mailto:a.bybee@bresnan.net))



## 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 10<sup>th</sup> 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](mailto: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 RCR 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://sdwisr8.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.