

6/27/2023



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

3:36 PM

Received by
EPA Region VIII
Hearing Clerk

June 27, 2023

Ref: 8ENF-W-SD

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Mr. Raman Suri, Owner and
KKSS Schultz, LLC
ramansuri11@gmail.com

Re: Administrative Order issued to KKSS Schultz, LLC and Raman Suri regarding Desert Trails Mobile Home Park Public Water System, PWS ID # WY5601608, Docket No.

SDWA-08-2023-0018

Dear KKSS Schultz, LLC Representative and Mr. Suri:

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 KKSS Schultz, LLC and Raman Suri (Respondents), as owner and manager of the Desert Trail Public Water System (System), have violated the EPA's drinking water regulations at 40 C.F.R. part 141 (Part 141). The EPA is issuing this Order because our previous compliance assurance efforts have not been effective in returning the System to compliance with 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 (*e.g.*, any monitoring that may have been done but not submitted, any updates to the number of service connections and/or individuals served). If the EPA does not hear from you, the EPA will assume this information is correct. If the Respondents comply with the Order, the EPA may close the Order without further action. Failure to comply with the Order may trigger immediate action by the EPA, including a complaint seeking administrative penalties. The complaint may lead to assessment of civil penalties of up to \$67,544 (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; 88 Fed. Reg. at 989 (January 6, 2023).

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 entities, in case these are relevant. SBREFA does not eliminate the responsibility to comply with the Order or Part 141. Also enclosed are several templates and fact sheets to assist Respondent in addressing the outstanding violations.

If you have any questions or to request an informal conference with the EPA, please contact Christina Carballal via email at carballal-broome.christina@epa.gov or by phone at (800) 227-8917, extension 6046, or (303) 312-6046. Any questions from your attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at 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,

Colleen Rathbone
Water Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosures

cc: WY DEQ/DOH (via email)
Sweetwater County Commissioners (westr@sweet.wy.us; shoemakers@sweet.wy.us)
EPA Regional Hearing Clerk (r8_hearing_clerk@epa.gov)
Mark Baron, WY DEQ District Engineer (rking@lcwy.org)
Chastity Witt, Property Manager (manager@deserttrailsmhp.com)
Mark Gillespie, Operator (luv2huntbux@gmail.com)
Mason Laughlin, Operator (Masonlaughlin@gmail.com)