



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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

2019 SEP 16 AM 10: 58

SEP 16 2019

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Ref: 8ENF-W-SD

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

The Honorable Luke Duncan, Chairman  
Ute Indian Tribe  
P.O. Box 190  
Fort Duchesne, Utah 84026-0190

Re: Amended Administrative Orders issued to the Ute Indian Tribe and Ute Tribe Public Works, Uriah Heeps Spring and Whiterocks Public Water Systems, PWS ID# 084990002 and 084990003, Docket No. **SDWA-08-2017-0019 & SDWA-08-2017-0020**

Dear Chairman Duncan:

Enclosed are Amended Administrative Orders (Amended Orders) 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). These Amended Orders modify the Administrative Orders issued on June 15, 2017, to the Ute Indian Tribe (Tribe) and Ute Tribe Public Works (Public Works) as owners and/or operators of the Uriah Heeps Spring and Whiterocks Public Water Systems (Systems). The Amended Orders include all violations identified in the original Orders, as well as violations that have occurred since the original Orders were issued, regardless of whether those violations have since been corrected. The Amended Orders will be valuable tools in informing and guiding the Systems' compliance efforts as they reflect the entire universe of previous noncompliance.

The Amended Orders are for compliance only. If the Tribe and Public Works comply with the Amended Orders, the EPA may close the Amended Orders without further action. Failure to comply with the Amended Orders or underlying drinking water regulations may lead to civil administrative penalties and/or a federal court injunction ordering compliance.

Please be aware that you are required to submit to the EPA a plan and schedule for installation of fencing around the spring collection laterals for both Systems as corrective actions to address the outstanding significant deficiency, in accordance with paragraph 51 of the Amended Order for the Uriah Heeps Spring PWS and paragraph 40 of the Amended Order for the Whiterocks PWS.

If you have any questions regarding the Amended Orders, please contact Olive Wittenberg via email at [wittenberg.olive@epa.gov](mailto:wittenberg.olive@epa.gov), or by phone at (800) 227-8917, extension 6467, or (303) 312-6467. Any questions from the Tribe's legal counsel should be directed to Matt Castelli, Assistant Regional Counsel, via email at [castelli.matthew@epa.gov](mailto:castelli.matthew@epa.gov), or by phone at (800) 227-8917, extension 6491, or (303) 312-6491.

We urge your prompt attention to this matter.

Sincerely,



Suzanne J. Bohan, Director  
Enforcement and Compliance Assurance Division

cc: Mr. Tony Small, Vice Chairman  
Mr. Ronald Wopsock, Uintah Band Representative  
Mr. Shaun Chapoose, Uncompahgre Band Representative  
Mr. Edred Secakuku, Whiteriver Band Representative  
Mr. Sal Wopsock, Uintah Band Representative  
Mr. Kirby Arrive, Executive Director  
Mr. Jeremy Patterson, Counsel for the Ute Indian Tribe  
Mr. Eli Chapoose, Director, Ute Tribe Public Works

Commander Dan Wallis, District Engineer  
Commander Kelli D. Mohler, District Environmental Health Officer  
Mr. Matthew Chadwick, Environmental Engineer  
Indian Health Service

Melissa Haniewicz, EPA Regional Hearing Clerk

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 2018 SEP 16 AM 10:58  
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IN THE MATTER OF: )  
 ) Docket No. SDWA-08-2017-0019  
Ute Indian Tribe )  
and Ute Tribe Public Works, )  
Whiterocks Public Water System, ) **AMENDED ADMINISTRATIVE ORDER**  
 )  
Respondents. )

1. This Order is issued under the authority vested in the Administrator of the U.S. 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. Respondent Ute Indian Tribe is a federally recognized tribe governed by the Uintah and Ouray Business Committee consisting of a Chairperson, Vice Chairperson, and two representatives from each Band.
3. Respondent Ute Tribe Public Works is an entity organized under the laws of the Uintah and Ouray Business Committee to provide, in part, drinking water services to some of the tribal communities located within the exterior boundaries of the Uintah & Ouray Reservation.
4. Respondents Ute Indian Tribe and Ute Tribe Public Works own and/or operate the Whiterocks Public Water System (System) which provides piped water to the public for human consumption.
5. The System is supplied by a groundwater source. The System collects water from a subsurface collection system and routes the collected water to a water treatment plant. The water is treated with phosphoric acid for corrosion control, sodium fluoride for fluoride addition, and gaseous chlorine for disinfection. The system has not notified the EPA that its water is treated to meet at least a 4-log, 99.99% removal of viruses.
6. Respondents are required to monitor disinfection by-products in accordance with the System's Stage 2 Monitoring Plan (Monitoring Plan) dated August 6, 2014, pursuant to 40 C.F.R. § 141.622.
7. The System has approximately 203 service connections used by year-round residents and/or regularly serves an average of approximately 812 year-round residents. Therefore, the System is a "public water system" and a "community water system" as defined in 40 C.F.R. § 141.2 and section 1401 of the Act, 42 U.S.C. § 300f.

8. Respondents are 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).
9. The Drinking Water Regulations include monitoring requirements. The EPA has sent Respondents annual notifications of the specific monitoring requirements that apply to the System.
10. Prior to issuing this Order, the EPA has provided Respondents extensive technical and compliance assistance to return the System to compliance with the Act and the Drinking Water Regulations.

### VIOLATIONS

11. Respondents are required to monitor the System’s water monthly for total coliform bacteria. 40 C.F.R. §§ 141.21(a) and 141.857(b). Respondents failed to monitor the System’s water for total coliform bacteria during September 2012, January and March 2013, February 2014, August 2016, and September and December 2017 and, therefore, violated this requirement.
12. Respondents are required to report total coliform analytical results to the EPA no later than (1) the first 10 days following the month in which the result is received, or (2) the first 10 days following the end of the required monitored period, whichever is earlier. 40 C.F.R. § 141.31(a). Respondents failed to report monitoring results for total coliform to the EPA within this time period for October 2016 and, therefore, violated this requirement.
13. Within 24 hours of being notified that any routine sample of the System’s water is positive for total coliform, Respondents were required to collect a set of four repeat samples. 40 C.F.R. § 141.21(b). Respondents failed to take four repeat samples of the System’s water within 24 hours of being notified on April 30, 2013, of a result that was positive for total coliform and, therefore, violated this requirement.
14. Respondents are required to monitor the System’s water annually for nitrate. 40 C.F.R. § 141.23(d). Respondents failed to monitor the System’s water for nitrate during 2011 and 2013 and, therefore, violated this requirement.
15. Respondents were required to monitor the System’s water for lead and copper triennially between 2011 through 2013, and annually in 2014, 2016 and 2017. Due to fluctuations in the System’s population, Respondents were required to collect 10 lead and copper samples in 2013, five lead and copper samples in 2014, 2015 and 2016, and 10 lead and copper samples in 2017. 40 C.F.R. § 141.86(d). Respondents failed to monitor the System’s water for lead and copper during the 2011 through 2013 monitoring period and the 2014, 2016 and 2017 monitoring periods and, therefore, violated this requirement.

16. Water systems that exceed the lead or copper action level are required to collect water quality parameter (WQP) samples at multiple tap locations and each entry to distribution system no later than six months after the beginning of the monitoring period during which the lead or copper action level was exceeded. 40 C.F.R. § 141.87(d). Sample results reported by the Respondents for the monitoring period of July – December 2018 exceeded the action level for copper. Respondents were required to collect WQP samples by December 31, 2018. Respondents failed to collect the required WQP samples and, therefore, violated this requirement.

17. Respondents are required to monitor the System's water at least once every three years for certain volatile organic contaminants. 40 C.F.R. § 141.24(f)(6). Respondents failed to monitor the System's water for volatile organic contaminants during the 2011 through 2013 monitoring period and, therefore, violated this requirement.

18. Respondents are required to monitor the System's water for synthetic organic contaminants at least once every three years. 40 C.F.R. § 141.24(h). Respondents failed to monitor the System's water for synthetic organic contaminants during the 2011 through 2013 monitoring period and, therefore, violated this requirement.

19. Respondents are required to monitor the System's water for cyanide at least once every three years. 40 C.F.R. § 141.23(a) and (c). Respondents failed to monitor the System's water for cyanide during the 2011 through 2013 monitoring period and, therefore, violated this requirement.

20. Respondents are required to monitor the System's water for sodium at least once every three years. 40 C.F.R. § 141.41(a). Respondents failed to monitor the System's water for sodium during the 2011 through 2013 monitoring period and, therefore, violated this requirement.

21. Respondents are required to collect a set of total trihalomethanes (TTHM) and haloacetic acids (HAA5) samples in the System's distribution system annually (40 C.F.R. § 141.621) at dates and locations identified in the Monitoring Plan (40 C.F.R. § 141.622(a)(1)). Respondents failed to monitor the System's water for TTHM and HAA5 during 2014, 2015 and 2016 and, therefore, violated this requirement.

22. Respondents are required to prepare and deliver an annual Consumer Confidence Report (CCR) to the System's customers by July 1 of each year and to certify to the EPA that it has done so. The CCR is to include information about the quality of the System's water using data collected during, or prior to, the previous calendar year. 40 C.F.R. §§ 141.151-141.155. Respondents failed to prepare and deliver an annual CCR for 2012 to the System's customers and to the EPA. Respondents also failed to provide a certification to the EPA for 2012 and 2017. Therefore, Respondents violated these requirements.

23. Respondents are required to provide a consumer notice of the individual lead tap water results to the persons served by the System no later than 30 days after the System learns of the tap monitoring results. 40 C.F.R. § 141.85(d). Respondents failed to provide the consumer notice and, therefore, violated this requirement.

24. Respondents are required to complete corrective action of a significant deficiency in compliance with an EPA-approved corrective action schedule or within 120 days of receiving written notification from the EPA of the significant deficiency. 40 C.F.R. § 141.404. Respondents are required to notify the EPA within 30 days of completion of a significant deficiency corrective action. 40 C.F.R. § 141.405(a)(2). Respondents were notified of significant deficiencies on December 12, 2013, and April 13, 2017, but failed to complete corrective action of the significant deficiencies by April 11, 2014, and October 13, 2017, respectively and, therefore, violated this requirement.

25. Respondents are required to notify the public of certain violations of the Drinking Water Regulations. 40 C.F.R. §§ 141.201-141.211. Respondents failed to notify the public of the violations cited in paragraphs 11 through 21 above and, therefore, violated this requirement.

26. Respondents are required to report any failure to comply with any total coliform monitoring requirement to the EPA within 10 days after discovering the violation. 40 C.F.R. § 141.21(g)(2) and 40 C.F.R. § 141.861(a)(4). Respondents failed to report the violations cited in paragraphs 11 and 12 above to the EPA and, therefore, violated this requirement.

27. Respondents are required to report any failure to comply with any Drinking Water Regulation to the EPA within 48 hours (except where the Drinking Water Regulations specify a different time period). 40 C.F.R. § 141.31(b). Respondents failed to report the violations cited in paragraphs 14 through 22 above to the EPA and, therefore, violated this requirement.

### **ORDER**

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

28. 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 any violation of total coliform monitoring requirements in 40 C.F.R. part 141 to the EPA within 10 days after discovering the violation, as required by 40 C.F.R. § 141.861(a)(4).

29. Unless a different reporting requirement is specified by the Drinking Water Regulations or this Order, Respondents 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 earliest. 40 C.F.R. § 141.31(a).

30. Respondents shall monitor the System's water for nitrate annually as required by the Drinking Water Regulations. 40 C.F.R. § 141.23. Respondents shall report analytical results to the EPA within the first 10 days following the month in which Respondents received sample results, as required by 40 C.F.R. § 141.31(a).

31. Respondents shall monitor the System's water for lead and copper as directed by the EPA in accordance with 40 C.F.R. § 141.86(b), (c) and (d). Within the first 10 days following the end of each monitoring period, Respondents shall report analytical results to the EPA, as required by 40 C.F.R. § 141.90.

32. Respondents shall collect WQP samples at two tap locations and each entry point to the distribution system as required by 40 C.F.R. § 141.87(d). Respondents shall report these WQP results to the EPA within the first 10 days following the end of each applicable monitoring period. 40 C.F.R. § 141.90(a).

33. Respondents shall monitor the System's water for volatile organic as required by 40 C.F.R. § 141.24(f)(6). Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received as required by 40 C.F.R. § 141.31(a).

34. Respondents shall monitor the System's water for synthetic organic contaminants, as required by 40 C.F.R. § 141.24(h). Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received, as required by 40 C.F.R. § 141.31(a).

35. Respondents shall monitor the System's water for cyanide, as required by 40 C.F.R. § 141.23(a) and (c). Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received, as required by 40 C.F.R. § 141.31(a).

36. Respondents shall monitor the System's water for sodium, as required by 40 C.F.R. § 141.41(a). Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received, as required by 40 C.F.R. § 141.31(a).

37. Respondents shall collect two sets of TTHM and HAA5 samples in the System's distribution system at the locations and dates identified in the Monitoring Plan, as required by 40 C.F.R. § 141.620 – 622. Respondents shall submit the results of the locational running annual averages (LRAA) compliance calculations to the EPA within 10 days following the end of each compliance period. 40 C.F.R. § 141.629(a).

38. Respondents shall prepare and distribute an annual CCR and provide a certification to the EPA as required by 40 C.F.R. §§ 141.151- 155.

39. Within 30 days of receiving monitoring results, Respondents shall deliver a consumer notice of individual tap monitoring results to the persons served at each sampled site, in accordance with 40 CFR 141.85(d). Within 90 days following the end of each monitoring period, Respondents shall submit to the EPA a sample copy of the consumer notification along with a certification that the notification has been distributed, in accordance with 40 CFR 141.90(f)(3).

40. Within 30 days after receipt of this Order, Respondents shall submit to the EPA a proposed plan and schedule regarding appropriate corrective actions for addressing the following significant deficiency. 40 C.F.R. §§ 141.403(a)(4) and 404(a).

- a. Secure fencing is required around Spring SPR01 collection area to keep livestock at least 100 feet from the spring collection laterals.

41. The plan shall include proposed modifications to the System, estimated costs of modifications, and a proposed schedule for completion of corrective actions outlined in paragraph 40 above. The proposed schedule shall include specific milestone dates and a final compliance date. The final compliance date shall be within six months from the date of the EPA's approval of the schedule. The schedule must be approved by the EPA before construction or modifications may begin.

42. The schedule required by paragraph 40 above shall be incorporated into this Order as an enforceable requirement upon written approval by the EPA.

43. Within 30 days after receipt of the EPA's approval of the schedule required by paragraph 40 above, Respondents shall provide the EPA with quarterly reports on the progress made toward bringing the System into compliance with treatment technique requirements for ground water systems. Each quarterly report is due by the 10<sup>th</sup> day of the month following the relevant quarter.

44. Within 10 days after completing all tasks included in the schedule required by paragraph 40 above, Respondents shall notify the EPA of the project's completion.

45. Within 30 days after receipt of this Order, Respondents shall notify the public of the violations cited in paragraphs 11 through 21 above. Thereafter, following any future violation of the Drinking Water Regulations, Respondents shall comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 days after providing public notice, Respondents shall submit a copy of the notice to the EPA.



46. For any future violation of the Drinking Water Regulations for which this Order does not specify a reporting period, Respondents shall 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 the Drinking Water Regulations specify a different time period for reporting the particular violation, Respondents shall report the violation to the EPA within that different period.

47. This Order shall be binding on Respondents and any person (e.g., employee, contractor, or other agent) acting in concert with Respondents.

48. If Respondents contract with or hire any other person or entity to operate the System, Respondents shall, no later than the date of such contract, provide a copy of this Order to the contractor. No later than 10 days thereafter, Respondents shall notify the EPA in writing of the contract, with such notification to include the name and contact information of the person who has contracted to operate the System and a copy of the contract. Respondents shall remain obligated to comply with this Order even if Respondents hire another person or entity to operate the System.

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

Email: R8DWU@epa.gov, and  
wittenberg.olive@epa.gov

#### **GENERAL PROVISIONS**

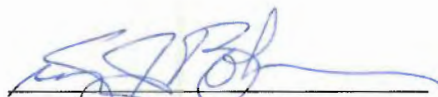
50. This Order shall not constitute a waiver, suspension, or modification of any requirement of the Act or the Drinking Water Regulations. Issuance of this Order is not an election by the EPA to forgo any civil or criminal action.

51. Violation of any part of this Order or the Drinking Water Regulations may subject Respondents to a civil penalty of up to \$57,317 (as adjusted for inflation) per day of violation. 42 U.S.C. § 300g-3; 40 C.F.R. part 19.

52. Respondents 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).

53. This Order is effective upon receipt by Respondents and will continue to be in effect until closed by the EPA.

Issued: Sept. 16, 2019.



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Suzanne J. Bohan, Director  
Enforcement and Compliance Assurance Division



system, Johnson Water District-Independence, triggers water quality parameter monitoring, as required by 40 C.F.R. § 141.87(d).

8. Respondents are required to monitor disinfection by-products in accordance with the System's Stage 2 Monitoring Plan (Monitoring Plan) dated August 6, 2014, pursuant to 40 C.F.R. § 141.622.

9. The System has approximately 910 service connections used by year-round residents and/or regularly serves an average of approximately 3500 year-round residents. Therefore, the System is a "public water system" and a "community water system" as defined in 40 C.F.R. § 141.2 and section 1401 of the Act, 42 U.S.C. § 300f.

10. Respondents are 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).

11. The Drinking Water Regulations include monitoring requirements. The EPA has sent Respondents annual notifications of the specific monitoring requirements that apply to the System.

12. Prior to issuing this Order, the EPA has provided Respondents extensive technical and compliance assistance to return the System to compliance with the Act and the Drinking Water Regulations.

### VIOLATIONS

13. Respondents are required to monitor the System's water monthly for total coliform bacteria. 40 C.F.R. §§ 141.21(a) and 141.857(b). Respondents failed to monitor the System's water for total coliform bacteria during September 2012, January and March 2013, February 2014, August 2016, September and December 2017, and September 2018, and, therefore, violated this requirement.

14. Respondents are required to report total coliform analytical results to the EPA no later than (1) the first 10 days following the month in which the result is received, or (2) the first 10 days following the end of the required monitored period, whichever is earlier. 40 C.F.R. § 141.31(a). Respondents failed to report monitoring results for total coliform to the EPA within this time period for October 2016 and, therefore, violated this requirement

15. If two or more samples collected in any month from the System's water are positive for total coliform, then the System has not complied with the maximum contaminant level (MCL) for total coliform bacteria. 40 C.F.R. § 141.63(a)(2). During each of the months of February and

April 2013, two or more samples from the System were positive for total coliform and, therefore, Respondents violated this requirement.

16. 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. 40 C.F.R. § 141.402. The System has not notified the EPA that its water is treated to meet at least a 4-log, 99.99% removal of viruses. For triggered source water monitoring, Respondents must sample each groundwater source and have it analyzed for a fecal indicator (i.e. *E. coli*). Respondents were notified on February 20, 2013, that a routine sample (collected pursuant to 40 C.F.R. § 141.21(a) and not invalidated under 40 C.F.R. § 141.21(c)) was positive for total coliform. However, Respondents failed to collect any groundwater source samples within 24 hours and, therefore, violated this requirement. 40 C.F.R. § 141.402.

17. Respondents are required to monitor the System's water annually for nitrate. 40 C.F.R. § 141.23(d). Respondents failed to monitor the System's water for nitrate during 2011 and 2013 and, therefore, violated this requirement.

18. Respondents were required to monitor the System's water triennially between 2012 through 2014, and annually in 2015, 2016, and 2017 for lead and copper. Due to fluctuations in the System's population, respondents were required to collect 10 lead and copper samples in 2014, 2015 and 2016, and 20 lead and copper samples in 2017. 40 C.F.R. § 141.86(d). Respondents failed to monitor the System's water for lead and copper during the 2012 through 2014 monitoring period and the 2015, 2016 and 2017 monitoring periods and, therefore, violated this requirement.

19. Water systems that exceed the lead or copper action level are required to collect water quality parameter (WQP) samples at multiple tap locations and each entry to distribution system no later than 6 months after the beginning of the monitoring period during which the lead or copper action level was exceeded. 40 C.F.R. § 141.87(d). Sample results reported by the Respondents exceeded the action level for copper during the monitoring periods of January – June 2018 and July – December 2018. Respondents were required to collect WQP samples by June 30, 2018 and December 31, 2018. Respondents failed to collect the required WQP samples, and, therefore, violated this requirement.

20. Water systems that exceed the lead or copper action level are required to collect one source water lead and copper sample from each entry point to the distribution system no later than six months after the end of the monitoring period during which the lead or copper action level was exceeded. 40 C.F.R. § 141.83(a)(1). Sample results reported by the Respondents for the monitoring periods of January – June 2018 and July – December 2018 exceeded the action level for copper. Respondents were required to collect source water lead and copper samples by December 31, 2018. Respondents failed to collect the required source water lead and copper samples and, therefore, violated this requirement.

21. Water systems that exceed the lead or copper action level are required to make a source water treatment recommendation no later than six months after the end of the monitoring period during which the lead or copper action level was exceeded. 40 C.F.R. § 141.83(b)(1). Sample results reported by the Respondents for the monitoring periods of January – June 2018 and July – December 2018 exceeded the action level for copper. Respondents were required make a source water treatment recommendation by December 31, 2018 for the January – June 2018 monitoring period. Respondents failed to make a source water treatment recommendation by December 31, 2018 and, therefore, violated this requirement.

22. Respondents are required to monitor the System's water at least once every three years for certain volatile organic contaminants. 40 C.F.R. § 141.24(f)(6). Respondents failed to monitor the System's water for volatile organic contaminants during the 2011 – 2013 monitoring period and, therefore, violated this requirement.

23. Respondents are required to monitor the System's water for synthetic organic contaminants at least once every three years. 40 C.F.R. § 141.24(h). Respondents failed to monitor the System's water for synthetic organic contaminants during the 2011 – 2013 monitoring period and, therefore, violated this requirement.

24. Respondents are required to monitor the System's water for detected synthetic organic contaminants quarterly at each sampling point which resulted in a detection. 40 C.F.R. § 141.24(f)(11)(i). On June 21, 2017, di(2-ethylhexyl) phthalate was detected in the System's water at a level exceeding 0.0005 milligrams per liter (mg/l). Respondents failed to monitor the System's water for di(2-ethylhexyl) phthalate during the third quarter (July through September) 2018 and the first quarter (January through March) 2019 and, therefore, violated this requirement.

25. Respondents are required to monitor the System's water for cyanide at least once every three years. 40 C.F.R. § 141.23(a) and (c). Respondents failed to monitor the System's water for cyanide during the 2011 – 2013 monitoring period and, therefore, violated this requirement.

26. Respondents are required to monitor the System's water for sodium at least once every three years. 40 C.F.R. § 141.41(a). Respondents failed to monitor the System's water for sodium during the 2011 – 2013 monitoring period and, therefore, violated this requirement.

27. Respondents are required to collect a set of total trihalomethanes (TTHM) and haloacetic acids (HAA5) samples in the System's distribution system (40 C.F.R. § 141.621) at dates and locations identified in the Monitoring Plan (40 C.F.R. § 141.622(a)(1)). Respondents failed to monitor the System's water for TTHM and HAA5 during 2014, 2016 and 2018, and failed to monitor in the correct month of July during 2015 as specified in the Monitoring Plan and, therefore, violated this requirement.

28. Respondents are required to prepare and deliver an annual Consumer Confidence Report (CCR) to the System's customers by July 1 of each year and to certify to the EPA that it has done so. The CCR is to include information about the quality of the System's water using data collected during, or prior to, the previous calendar year. 40 C.F.R. §§ 141.151-141.155. Respondents failed to prepare and deliver an annual CCR for 2012, 2013, 2014 and 2017 to the System's customers and to the EPA. Respondents also failed to provide certifications to the EPA for 2012, 2013, 2014 and 2017. Therefore, Respondents violated these requirements.

29. Respondents are required to consult with the EPA regarding the appropriate corrective action within 30 days of receiving written notification from the EPA of a significant deficiency. 40 C.F.R. § 141.403(a)(4). Respondents are required to notify the EPA within 30 days of completion of a significant deficiency corrective action. 40 C.F.R. § 141.405(a)(2). The Respondents received a letter from the EPA on November 1, 2013, that detailed significant deficiencies identified during a Sanitary Survey of the System conducted on June 19-20, 2013. Respondents failed to either consult with the EPA regarding the corrective actions or notify the EPA of completion of a corrective action by December 1, 2013, and, therefore, violated this requirement.

30. Respondents are required to complete corrective action of a significant deficiency in compliance with an EPA-approved corrective action schedule or within 120 days of receiving written notification from the EPA of the significant deficiency. 40 C.F.R. § 141.404. Respondents are required to notify the EPA within 30 days of completion of a significant deficiency corrective action. 40 C.F.R. § 141.405(a)(2). Respondents were notified in writing of significant deficiencies on November 1, 2013, and April 13, 2017, but failed to complete corrective action of the significant deficiencies by March 1, 2014, and October 13, 2017, respectively and, therefore, violated this requirement.

31. Respondents are required to provide a consumer notice of the individual lead tap water results to the persons served by the System no later than 30 days after the System learns of the tap monitoring results. 40 C.F.R. § 141.85(d). Respondents failed to provide the consumer notice within 30 days of learning of the tap monitoring results for the January – June 2018 and July – December 2018 periods, and, therefore, violated this requirement.

32. Respondents are required to notify the public of certain violations of the Drinking Water Regulations. 40 C.F.R. §§ 141.201-141.211. With the exception of the April 2013 MCL for total coliform bacteria, Respondents failed to notify the public of the violations cited in paragraphs 13 through 26 above within the required timeframes and, therefore, violated this requirement.

33. Respondents are required to report any failure to comply with any total coliform monitoring requirement to the EPA within 10 days after discovering the violation. 40 C.F.R.

§ 141.21(g)(2) and 40 C.F.R. § 141.861(a)(4). Respondents failed to report the violations cited in paragraph 13 above to the EPA and, therefore, violated this requirement.

34. Respondents are required to report any coliform MCL violation to the EPA no later than the end of the next business day after learning of it. 40 C.F.R. § 141.21(g)(1). Respondents did not notify the EPA of the MCL violations cited in paragraph 14 above and, therefore, violated this requirement.

35. Respondents are required to report any failure to comply with any Drinking Water Regulation to the EPA within 48 hours (except where the Drinking Water Regulations specify a different time period). 40 C.F.R. § 141.31(b). Respondents failed to report the violations cited in paragraphs 13 through 26 above to the EPA and, therefore, violated this requirement.

### **ORDER**

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

36. 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 any violation of total coliform monitoring requirements in 40 C.F.R. part 141 to the EPA within 10 days after discovering the violation, as required by 40 C.F.R. § 141.861(a)(4).

37. Unless a different reporting requirement is specified by the Drinking Water Regulations or this Order, Respondents 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).

38. 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 days after the end of the month in which the sample is taken. If the sample is fecal indicator (e.g. E. coli) positive, Respondents shall notify the EPA immediately for appropriate assistance in meeting the requirement of 40 C.F.R. § 141.402(g) to provide public notice within 24 hours as required by 40 C.F.R. § 141.202. When reporting any triggered source water sample result to the EPA, Respondents shall specify that it is a triggered source water sample. Respondents 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).



39. Respondents shall monitor the System's water for nitrate annually as required by the Drinking Water Regulations. 40 C.F.R. § 141.23. Respondents shall report analytical results to the EPA within the first 10 days following the month in which Respondents received sample results, as required by 40 C.F.R. § 141.31(a).

40. Respondents shall monitor the System's water for lead and copper as directed by the EPA in accordance with 40 C.F.R. § 141.86(b), (c) and (d). Within the first 10 days following the end of each monitoring period, Respondents shall report analytical results to the EPA, as required by 40 C.F.R. § 141.90.

41. Respondents shall collect WQP samples at three tap locations and each entry point to the distribution system during each six-month period in which the System exceeds the lead or copper action level, as required by 40 C.F.R. § 141.87(d). Respondents shall report analytical results to the EPA within the first 10 days following the end of each applicable monitoring period. 40 C.F.R. § 141.90(a).

42. Respondents shall collect one source water lead and copper sample from each entry point to the distribution system no later than six months after the end of the monitoring period during which the lead or copper action level was exceeded. 40 C.F.R. § 141.83(a)(1). Respondents shall report analytical results to the EPA within the first 10 days following the end of each applicable monitoring period. 40 C.F.R. § 141.90(a).

43. Respondents shall make a source water treatment recommendation no later than six months after the end of any monitoring period during which the lead or copper action level is exceeded, as required by 40 C.F.R. § 141.83(b)(1).

44. Respondents shall maintain OWQPs at a minimum pH level of 7.0 and a minimum residual concentration of 3.0 mg/l orthophosphate (as PO<sub>4</sub>) in the distribution system, or as directed by EPA. Respondents shall monitor and report WQPs as required by 40 C.F.R. § 141.87(c) and 141.90.

45. Respondents shall monitor the System's water for volatile organic contaminants as required by 40 C.F.R. § 141.24(f)(6). Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received as required by 40 C.F.R. § 141.31(a).

46. Respondents shall monitor the System's water for synthetic organic contaminants as required by 40 C.F.R. § 141.24. Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received as required by 40 C.F.R. § 141.31(a).

47. Respondents shall monitor the System's water for cyanide as required by 40 C.F.R. § 141.23(a) and (c). Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received, as required by 40 C.F.R. § 141.31(a).

48. Respondents shall monitor the System's water for sodium as required by 40 C.F.R. § 141.41(a). Respondents shall report any analytical results to the EPA within the first 10 days following the month in which sample results are received, as required by 40 C.F.R. § 141.31(a).

49. Respondents shall collect two sets of TTHM and HAA5 samples in the System's distribution system at the locations and dates (annually during July) identified in the Monitoring Plan, as required by 40 C.F.R. § 141.620 – 622. Respondents shall submit the results of the LRAA compliance calculations to the EPA within 10 days following the end of each compliance period. 40 C.F.R. § 141.629(a).

50. Respondents shall prepare and distribute a CCR by July 1 and provide a certification to the EPA by October 1 annually, as required by 40 C.F.R. §§ 141.151-155.

51. Within 30 days after receipt of this Order, Respondents shall submit to the EPA a proposed plan and schedule regarding appropriate corrective actions for addressing the following significant deficiency. 40 C.F.R. §§ 141.403(a)(4) and 404(a).

- a. Secure fencing is required around Spring SPR01 collection area to keep livestock at least 100 feet from the spring collection laterals.

52. The plan shall include proposed modifications to the System, estimated costs of modifications, and a proposed schedule for completion of the corrective action outlined in paragraph 51 above. The proposed schedule shall include specific milestone dates and a final compliance date. The final compliance date shall be within six months from the date of the EPA's approval of the schedule. The schedule must be approved by the EPA before construction or modifications may begin.

53. The schedule required by paragraph 51 above shall be incorporated into this Order as an enforceable requirement upon written approval by the EPA.

54. Within 30 days after receipt of the EPA's approval of the schedule required by paragraph 51 above, Respondents shall provide the EPA with quarterly reports on the progress made toward bringing the System into compliance with treatment technique requirements for groundwater systems. Each quarterly report is due by the 10<sup>th</sup> day of the month following the relevant quarter.

55. Within 10 days after completing all tasks included in the schedule required by paragraph 51 above, Respondents shall notify the EPA of the project's completion.

56. Respondents shall provide a consumer notice of the individual lead tap water results to the persons served by the System, as required by 40 C.F.R. § 141.85(d).

57. Respondents shall notify the public of the violations cited in paragraphs 13 through 27, above. Thereafter, following any future violation of the Drinking Water Regulations, Respondents shall comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 days after providing public notice, Respondents shall submit a copy of the notice to the EPA.

58. For any future violation of the Drinking Water Regulations for which this Order does not specify a reporting period, Respondents shall 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 the Drinking Water Regulations specify a different time period for reporting the particular violation, Respondents shall report the violation to the EPA within that different period.

59. Respondents shall report any violation of the Revised Total Coliform Rule requirements in 40 C.F.R. part 141 subpart Y to the EPA within the time period specified for reporting particular violations, as required by 40 C.F.R. § 141.861.

60. This Order shall be binding on Respondents and any person (e.g., employee, contractor, or other agent) acting in concert with Respondents.

61. If Respondents contract with or hire any other person or entity to operate the System, Respondents shall, no later than the date of such contract, provide a copy of this Order to the contractor. No later than 10 days thereafter, Respondents shall notify the EPA in writing of the contract, with such notification to include the name and contact information of the person who has contracted to operate the System and a copy of the contract. Respondents shall remain obligated to comply with this Order even if Respondents hire another person or entity to operate the System.

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

Email: [R8DWU@epa.gov](mailto:R8DWU@epa.gov), and  
[wittenberg.olive@epa.gov](mailto:wittenberg.olive@epa.gov)

**GENERAL PROVISIONS**


63. 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.

64. Violation of any part of this Order or the Drinking Water Regulations may subject Respondents to a civil penalty of up to \$57,317 (as adjusted for inflation) per day of violation. 42 U.S.C. § 300g-3; 40 C.F.R. part 19.

65. Respondents 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).

66. This Order is effective upon receipt by Respondents and will continue to be in effect until closed by the EPA.

Issued: Sept. 16, 2019.

  
Suzanne J. Bohan, Director  
Enforcement and Compliance Assurance Division

COMPLIANCE ASSISTANCE HISTORY  
URIAH HEEPS AND WHITEROCKS PWS

Date	Type	Subject Matter	Tribal Recipient
5/11/2018	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
5/18/2018	2 Emails from Seth Tourney	Reminder to collect chlorine residual each time an RTCR sample is collected. One email per system.	Eli Chapoose, Spring Clemente, Bart Powaukee
5/18/2018	Email from Nate Delano	Information regarding ideal LCR water quality parameter tap sample location	Eli Chapoose
5/24/2018	Email from Nate Delano	Information regarding common significant deficiencies at wells, as requested by Eli	Eli Chapoose
5/24/2018	Email from Nate Delano	Email reminding the system that EPA had not yet received required monthly RTCR samples	Eli Chapoose, Rosailea Vanderhoop
5/31/2018	Email from Joy Shulman	Email asking the system to correct mistake on RTCR lab slip	Eli Chapoose, Rosailea Vanderhoop
6/12/2018	Email from Nate Delano	Email providing system required information to be included in annual CCR, and reminder of due date for CCR	Eli Chapoose, Rosailea Vanderhoop
6/13/2018	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
6/19/2018	Email from Nate Delano	Email requesting RTCR chain of custody forms	Eli Chapoose, Rosailea Vanderhoop
6/20/2018	Email from Jaime Harris	Email request further corrections to RTCR lab slips	Eli Chapoose, Spring Clemente
6/20/2018	Email from Kendra Morrison	Email informing system of new monitoring requirement for di(2-ethylhexyl) phthalate, do to failure by the system to collect required confirmation sample	Eli Chapoose, Spring Clemente
6/26/2018 to 6/29/2018	Technical Assistance Site Visit	Field visit by EPA contractor to assist operators with operations and maintenance of system, and compliance with SDWA. Specifically, this trip was focused on taking photos of corrected significant deficiencies and sending those photos to EPA, installation of storage tank vent cover and assisting with lead and copper sample collection, chain of custody, lab delivery, etc.	Eli Chapoose, Waylon Murdoch, Adrian Eagle Hawk
8/10/2018	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
8/17/2018	2 Emails from Seth Tourney	Reminder to collect chlorine residual each time an RTCR sample is collected. One email per system.	Eli Chapoose, Bart Pawaukee
8/28/2018	Email from Natalie Cannon	Draft revision of TSSP, in keeping with the samples the system collected during first 6-month monitoring period for Whiterocks	Eli Chapoose
9/7/2018	Email from Seth Tourney	Reminder of missing DBP results at Uriah Heeps	Eli Chapoose, Rosailea Vanderhoop
9/7/2018	Email from Natalie Cannon	Draft revision of TSSP, in keeping with the samples the system collected during first 6-month monitoring period for Uriah Heeps	Eli Chapoose
9/12/2018	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
9/14/2018	2 Emails from Seth Tourney	Reminder to collect chlorine residual each time an RTCR sample is collected. One email per system.	Eli Chapoose, Rosailea Vanderhoop
10/10/2018	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
10/12/2018	Email from Nate Delano	Invitation to join EPA webinar	Eli Chapoose
10/15/2018	2 Emails from Seth Tourney	Reminder to collect chlorine residual each time an RTCR sample is collected. One email per system.	Eli Chapoose, Rosailea Vanderhoop
10/16/2018	Email from Mary Sheldon	Reminder to provide EPA with LCR consumer notice documents	Eli Chapoose
11/1/2018 to 11/2/2018	Technical Assistance Site Visit	Field visit by EPA contractor to assist operators with operations and maintenance of system, and compliance with SDWA. Specifically, this trip was focused on assisting with installation of tank vents, verifying repair of the Uriah Heeps, White Rocks Springs access manholes, and assisting with the Uriah Heeps and White Rocks CCRs.	Eli Chapoose, Waylon Murdoch, Adrian Eagle Hawk
11/2/2018	Email from Nate Delano	Clarification of two LCR samples that were labeled as being from the same location	Eli Chapoose, Rosailea Vanderhoop
11/8/2018	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
12/3/2018	Email from Olive Hofstader	Reminder to collect LCR samples during second six month monitoring period	Eli Chapoose, Rosailea Vanderhoop
12/7/2018	Email from Nate Delano	Reminder of all samples still required to be collected before the end of the year at both systems	Eli Chapoose, Rosailea Vanderhoop
12/10/2018	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose

COMPLIANCE ASSISTANCE HISTORY  
URIAH HEEPS AND WHITEROCKS PWS

1/3/2019 to 1/4/2019	Technical Assistance Site Visit	Field visit by EPA contractor to assist operators with operations and maintenance of system, and compliance with SDWA. Specifically, this trip was focused on assisting system in compliance with the Lead and Copper Rule, and completing CCRs.	Eli Chapoose, Waylon Murdoch, Adrian Eagle Hawk
2/11/2019	Phone Call from Nate Delano	Phone call explaining requirements following a TC+	Eli Chapoose
2/12/2019	5 Emails from Natalie Cannon	Email requesting clarification on LCR samples that were sent multiple times	Eli Chapoose
2/12/2019	Email from Seth Tourney	Email informing system of triggered GW source monitoring requirements following a positive total coliform result	Eli Chapoose, Rosalea Vanderhoop
2/19/2019	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
2/26/2019	Email from Nate Delano	Email explaining how additional RTRC samples will be counted, given that the system did not collect coliform samples in time following routine total coliform positive	Eli Chapoose, Adrian Eaglehawk
3/4/2019	Email from Seth Tourney	Email reminding system that they still must collect triggered GW source sample at Whiterocks, following TC+ at Uriah Heeps	Eli Chapoose, Rosalea Vanderhoop
3/6/2019	Email from Jaime Harris	Email closing level 1 assessment, requesting system collect total coliform every time they collect an RTRC sample	Eli Chapoose
3/7/2019	Email from Nate Delano	Email informing systems of the closure of several significant deficiencies	Eli Chapoose, Adrian Eaglehawk
3/7/2019	2 Emails from Nate Delano	Email providing systems required CCR information that must be provided to consecutive systems by April 1st	Eli Chapoose, Adrian Eaglehawk
3/21/2019	Annual Mass Mailing, delivered via email for both systems	Annual "Mass Mailing" to Uriah Heeps and White Rocks, informing system of upcoming monitoring requirements, sanitary surveys, and other important information over the next calendar year.	Eli Chapoose, Rosalea Vanderhoop, Adrian Eaglehawk
3/22/2019	Email from Natalie Cannon	Email reminding systems that they must provide lead and copper consumer notice for the second monitoring period of 2018	Eli Chapoose
3/22/2019	Email from Nate Delano	Email reminding systems that they must provide lead and copper consumer notice for the second monitoring period of 2018	Adrian Eaglehawk
4/15/2019	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
5/2/2019	Phone Call from Nate Delano	Phone call explaining upcoming site visits	Eli Chapoose
5/2/2019	Email from Nate Delano	Email following up on phone call, providing answers to Eli's questions	Eli Chapoose
5/6/2019	Email from Nate Delano	Email following up on phone call, providing answers to Eli's questions	Eli Chapoose
5/6/2019	Email from Nate Delano	Email informing systems of an upcoming training in Salt Lake City	Eli Chapoose, Adrian Eaglehawk
5/13/2019	Automated Reminder to Sample, delivered via email	Automated reminder to both systems of their remaining monitoring requirements for the year	Eli Chapoose
5/14/2019	4 Emails from Natalie Cannon	Email requesting resolution of discrepancies in LCR tap sample plans	Eli Chapoose
5/15/2019	Email from Lee Michalsky	Email providing information on upcoming sanitary surveys	Eli Chapoose, Adrian Eaglehawk
5/21/2019 to 5/23/2019	Sanitary Survey	Field evaluation of water system to identify significant deficiencies and other potential hazards to public health	Eli Chapoose, Waylon Murdoch, Adrian Eagle Hawk, Rosalea Vanderhoop
July 2017 to July 2018	Phone Call from Olive Hofstader	Scheduled weekly calls to discuss status of AO requirements and assist with planning and scheduling tasks to complete each week.	Eli Chapoose, Sonja Willie
November 2017 to present	conference calls	Quarterly conference calls to coordinate with federal agencies and non-profits that provide technical assistance to Tribal drinking water systems. Entities included: IHS, EPA, Utah Rural Water, RCAC, Inter Tribal Council of Arizona, BIA, BOR, USDA-RD. Coordinated TA visits to ensure TA providers could meet with Eli Chapoose and provide targeted assistance on items in AO.	Eli Chapoose

URIAH HEEPS SPRING AND WHITEROCKS  
VIOLATIONS SINCE JANUARY 2018

PWS ID	PWS NAME	ANALYTE NAME	VIOLATION TYPE	COMPLIANCE PERIOD BEGIN	COMPLIANCE PERIOD END
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	Monitoring	1/1/2017	12/31/2017
084990002	URIAH HEEPS SPRING WATER SYSTEM	E. COLI	Monitoring	12/1/2017	12/31/2017
084990002	URIAH HEEPS SPRING WATER SYSTEM	CONSUMER CONFIDENCE RULE	CCR REPORT	7/1/2018	6/30/2019
084990002	URIAH HEEPS SPRING WATER SYSTEM	DISINFECTION BY-PRODUCTS	Monitoring	1/1/2018	12/31/2018
084990002	URIAH HEEPS SPRING WATER SYSTEM	E. COLI	Monitoring	9/1/2018	9/30/2018
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	LEAD CONSUMER NOTICE (LCR)	1/1/2018	6/27/2019
084990002	URIAH HEEPS SPRING WATER SYSTEM	CONSUMER CONFIDENCE RULE	CCR CERTIFICATION	10/1/2018	9/30/2019
084990002	URIAH HEEPS SPRING WATER SYSTEM	DI(2-ETHYLHEXYL) PHTHALATE	Monitoring	7/1/2018	9/30/2018
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	Monitoring, WQP tap	7/1/2018	12/31/2018
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	Monitoring, WQP ETD	7/1/2018	12/31/2018
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	Monitoring, WQP tap	1/1/2018	6/30/2018
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	Monitoring, WQP ETD	1/1/2018	6/30/2018
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	Monitoring, source water	1/1/2018	7/12/2019
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	Source Water Treatment Recommendation	1/1/2018	7/12/2019
084990002	URIAH HEEPS SPRING WATER SYSTEM	LEAD & COPPER RULE	LEAD CONSUMER NOTICE (LCR)	7/1/2018	6/27/2019
084990002	URIAH HEEPS SPRING WATER SYSTEM	DI(2-ETHYLHEXYL) PHTHALATE	Monitoring	1/1/2019	3/31/2019
084990003	WHITEROCKS WATER SYSTEM	LEAD & COPPER RULE	Monitoring	1/1/2017	12/31/2017
084990003	WHITEROCKS WATER SYSTEM	E. COLI	Monitoring	12/1/2017	12/31/2017
084990003	WHITEROCKS WATER SYSTEM	CONSUMER CONFIDENCE RULE	CCR REPORT	7/1/2018	6/30/2019
084990003	WHITEROCKS WATER SYSTEM	LEAD & COPPER RULE	LEAD CONSUMER NOTICE (LCR)	1/1/2018	6/5/2019
084990003	WHITEROCKS WATER SYSTEM	LEAD & COPPER RULE	LEAD CONSUMER NOTICE (LCR)	1/1/2018	6/5/2019
084990003	WHITEROCKS WATER SYSTEM	CONSUMER CONFIDENCE RULE	CCR CERTIFICATION	10/1/2018	9/30/2019
084990003	WHITEROCKS WATER SYSTEM	LEAD & COPPER RULE	Monitoring, WQP tap	7/1/2018	12/31/2018
084990003	WHITEROCKS WATER SYSTEM	LEAD & COPPER RULE	Monitoring, WQP ETD	7/1/2018	12/31/2018
084990003	WHITEROCKS WATER SYSTEM	LEAD & COPPER RULE	LEAD CONSUMER NOTICE (LCR)	7/1/2018	6/5/2019
084990003	WHITEROCKS WATER SYSTEM	LEAD & COPPER RULE	LEAD CONSUMER NOTICE (LCR)	7/1/2018	6/5/2019