



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Phone 800-227-8917  
http://www.epa.gov/region8

Ref: 8ENF-W-SD

March 22, 2022

3/22/2022

11:35 AM

**SENT VIA EMAIL**  
**DIGITAL READ RECEIPT REQUESTED**

Received by  
EPA Region VIII  
Hearing Clerk

Mr. Lenn T. Island, Registered Agent  
Beulah Land Water, LLC  
[islandlenn@gmail.com](mailto:islandlenn@gmail.com)

Re: Administrative Order Addendum, Lenn T. Island regarding  
Beulah Land Water, LLC Public Water System,  
PWS ID # WY5601692, Docket # **SDWA-08-2022-0004**

Dear Mr. Island:

This is an Addendum to the Administrative Order (Order) issued to you as the Respondent in the above-referenced matter on January 11, 2022. The purpose of this letter is to approve the February 18, 2022, schedule (Schedule) you submitted for coming into consistent compliance by correcting five significant deficiencies identified in the May 22, 2017, and June 16, 2021, sanitary survey reports. The Schedule is hereby incorporated into the Order pursuant to paragraph number 13. Each milestone and deadline specified below is an enforceable provision of the Order.

Milestone

Deadline

Overflow at the water storage tank (ST01) must be piped to an elevation between 12 and 24 inches above the ground surface and discharge over a drainage inlet structure, splash plate, or engineered riprap.	June 1, 2022
Overflow at the ST01, must be fitted with non-corrodible #24-mesh screen, or a properly sealed flapper or duckbill valve to prevent contamination from entering the water system. The screen should preferably be installed within the pipe at the location least susceptible to vandalism. When a flapper valve is used, a screen must be placed inside the valve. In cold climates, use of a flapper or duckbill valve should be considered to minimize air movement and hence ice formation in the tank. In cold climates, provision should be considered to prevent the flapper or such bill from freezing shut.	June 1, 2022
The air vent at ST01 must terminate in an inverted U construction at least 24" above the tank surface to prevent inhalation of contaminants by the tank.	June 1, 2022

To understand the unknown integrity of the storage tank air vent and access hatch the following must be provided: <ul style="list-style-type: none"> <li>• a copy of the completed Unknown Integrity Checklist;</li> <li>• a copy of a completed inspection report describing the condition of each specified tank component, which includes photographs and the date by when any corrective actions needed to address additional deficiencies with the tank components will be completed.</li> </ul>	June 1, 2022
<b>REGARDING TANK REPLACEMENT</b>	
Bear Lodge Engineering completes new tank engineering plans for presentation to Wyoming Department of Environmental Quality (DEQ) for final approval.	April 30, 2022
DEQ's reviews engineering plans and issues required permits.	June 30, 2022
DEQ's approves new tank final design specifications.	July 15, 2022
Tarsco Engineering and Manufacturing (Tarsco) reviews DEQ approved manufacturing ne tank design specifications and geotechnical data.	July 19, 2022
Tarsco shares tank manufacturing submittals to Beulah Land Water (Beulah) for review.	August 9, 2022
Beulah reviews and approves Tarsco's submittals.	August 29, 2022
Tarsco manufactures new tank.	December 5, 2022
Tarsco erects, seals and pressure tests the new tank, confirming it is fully operational.	December 29, 2022

Within 10 calendar days of completing all steps included in the above Schedule, please notify the EPA of the project's completion as required by the Order. The Order also requires you to achieve compliance by the final date specified in the approved Schedule. The EPA is authorized to seek penalties if these deadlines are not met. If you have a reasonable basis to believe you may be unable to meet any deadline in the Schedule, you must notify the EPA well in advance to request an extension. The EPA may, in its discretion, consider granting an extension.

As a reminder, you are required to provide the EPA with quarterly progress reports starting July 1, 2022.

The EPA acknowledges that the COVID-19 pandemic also may impact construction projects. If you have specific COVID-19 issues that would affect the timeframes listed herein, please contact Christina Carballal via email at [carballal-broome.christina@epa.gov](mailto:carballal-broome.christina@epa.gov) or by phone at (800) 227-8917, extension 6046, or (303) 312-6046 within 7 business days of receiving this Order. The EPA may, in its discretion, consider granting an extension.

If you have any questions concerning this Addendum, please contact Christina Carballal at the email and phone number provided above. Any questions from your attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at [bearley.mia@epa.gov](mailto:bearley.mia@epa.gov) or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

Sincerely,

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

Enclosures

Correction Notice  
Unknown Integrity of Finished Water Storage Tank Hatch-Vent Checklist

cc: WY DEQ/DOH (via email)  
Crook County Commissioners ([lindaf@crookcounty.wy.gov](mailto:lindaf@crookcounty.wy.gov); [kdennis@crookcounty.wy.gov](mailto:kdennis@crookcounty.wy.gov))  
Melissa Haniewicz, EPA Regional Hearing Clerk  
Pat Bundy and Tom Bundy, Beulah Land HOA Water Committee ([pbundy46@gmail.com](mailto:pbundy46@gmail.com);  
[tombundy@gmail.com](mailto:tombundy@gmail.com))