

Glen Rogers Public Service District

U.S. EPA Docket No. SDWA-03-2022-0056DS

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Philadelphia, Pennsylvania 19103**

In the Matter of:	:	
	:	
PWS ID WV3305508	:	ADMINISTRATIVE ORDER
GLEN ROGERS PUBLIC SERVICE DISTRICT	:	
c/o RAVENCLIFF, MCGRAWS, SAULSVILLE	:	U.S. EPA Docket No. SDWA-03-2022-0056DS
PUBLIC SERVICE DISTRICT	:	
4200 POPLAR GAP ROAD	:	Proceeding under Section 1414(g) of the
GLEN FORK, WYOMING COUNTY	:	Safe Drinking Water Act, as amended,
WEST VIRGINIA 25845	:	42 U.S.C. § 300g-3(g)
	:	
Respondent,	:	
	:	
GLEN ROGERS PUBLIC WATER SYSTEM	:	
	:	
System.	:	
	:	
	:	

I. STATUTORY AUTHORITY

The United States Environmental Protection Agency, Region III (“EPA” or “Agency”) has made the following FINDINGS OF FACTS and issues this ADMINISTRATIVE ORDER (“the Order”) pursuant to Section 1414(g) of the Safe Drinking Water Act (“SDWA” or “the Act”), 42 U.S.C. § 300g-3(g). The Administrator of EPA has delegated the authority to take these actions to the Regional Administrator of EPA, Region III, who has redelegated these authorities to the Director, Enforcement & Compliance Assurance Division, EPA Region III.

II. FINDINGS OF FACT, JURISDICTIONAL ALLEGATIONS, AND CONCLUSIONS OF LAW

1. Section 1414(g) of the Act, 42 U.S.C. § 300g-3(g), provides that, “In any case in which the Administrator is authorized to bring a civil action under this section or under section 300j-4 of this title with respect to any applicable requirement, the Administrator also may issue an order to require compliance with such applicable requirement.”
2. A “public water system” (“PWS”) is defined in the Act as “a system for the provision to the public of water for human consumption through pipes or other constructed conveyances, if such system has at least fifteen service connections or regularly serves at least twenty-five individuals.” Section 1401(4) of the SDWA, 42 U.S.C. § 300f(4).
3. A “community water system” is defined in the Act as “a public water system that . . . serves at least 15 service connections used by year-round residents . . . or regularly serves at least 25 year-round residents.” 42 U.S.C. § 300f(15).

4. As an association, Glen Rogers Public Service District (“Respondent”) is a “person” as defined by Section 1401(12) of the SDWA, 42 U.S.C. § 300f (12), and 40 C.F.R. § 141.2.
5. Respondent is a person who owns and operates a public water system and is a “supplier of water” as defined by Section 1401(5) of the SDWA, 42 U.S.C. § 300f(5), and 40 C.F.R. § 141.2.
6. Respondent is the owner and operator of the Glen Rogers Public Water System, PWS Identification Number WV3305508 (“System”), located at 4200 Poplar Gap Road, Glen Fork, West Virginia 25845, which provides water for human consumption.
7. The System is a public water system that provides water from a purchased groundwater source. The System serves a population of approximately 283 persons for a minimum of six months per year and has 114 service connections year-round, and is therefore a “community water system” or “CWS,” as defined by Section 1401(16) of the SDWA, 42 U.S.C. § 300f(15) and 40 C.F.R. 141.2.
8. The State of West Virginia, acting through the West Virginia Department of Health and Human Resources (“WVDHHR”), has primary enforcement responsibility under Section 1413(a) of the SDWA, 42 U.S.C. § 300g-2(a).
9. According to Section 1411 of the SDWA, 42 U.S.C. § 300g, Respondent is required to comply with the National Primary Drinking Water Regulations (“NPDWRs”) in Part B of the SDWA and 40 C.F.R. Part 141, including but not limited to sampling and analyzing the drinking water and reporting analytical results to the state.
10. As required by 40 C.F.R. § 142.15, WVDHHR notified EPA through the Safe Drinking Water Information System (“SDWIS”) of the violations listed in the following paragraphs. SDWIS contains records about public water systems and their violations of EPA’s drinking water regulations, as reported to EPA by the states.
11. On November 10, 2020, EPA issued a Notice of Violation (“NOV”) to Respondent for the violations of the SDWA described in the paragraphs below and required resolution of any outstanding compliance issues within thirty (30) days, or by December 10, 2020.
12. Pursuant to Section 1414(g)(2) of the SDWA, 42 U.S.C. § 300g-3(g)(2), EPA has offered WVDHHR an opportunity to confer with the Agency regarding the Order by submitting an advance draft copy of this Order to WVDHHR.
13. Because the System serves less than 3,300 persons, it is considered small size under the Lead and Copper Rule (“LCR”) in accordance with 40 C.F.R. § 141.2. The System was formerly subject to reduced lead and copper tap monitoring on a triennial basis per its approved LCR sampling plan, which required at least 5 sample sites pursuant to 40 C.F.R. § 141.86(c)-(d). Systems sampling on a reduced basis, either triennial or annual, shall conduct lead and copper tap sampling during the months of June, July, August, or September unless otherwise approved in accordance with 40 C.F.R. § 141.86(d)(4)(iv). Systems shall report lead and copper tap monitoring results within the first 10 days following the end of the applicable monitoring period in accordance with 40 C.F.R. § 141.90(1).

**COUNT I
FAILURE TO PROVIDE NOTICE OF LEAD AND COPPER RESULTS TO INDIVIDUALS
DURING PERIOD 2013 THROUGH 2015**

14. 40 C.F.R. § 141.85(d) (Public education and supplemental monitoring and mitigation requirements) requires that all water systems deliver a notice of the lead tap water monitoring results to persons served by the water system at sites that are sampled and specifies the timing and content of this notification.
15. For the triennial monitoring period of 2013 through 2015, the Respondent conducted lead and copper sampling for the System but failed to provide notice of lead results to individuals served by taps used for LCR tap monitoring.
16. Respondent’s failure to provide notice of lead results to individuals served by taps used for LCR tap monitoring, in accordance with the specified timing, content, and delivery requirements, for the triennial monitoring period of 2013 through 2015, violated the requirements of 40 C.F.R. § 141.85(d)(1)-(3).

**COUNT II though VI
FAILURE TO CONDUCT LEAD AND COPPER MONITORING,
FAILURE TO REPORT AND PROVIDE NOTICE OF LEAD AND COPPER
MONITORING, AND FAILURE TO CONSULT
DURING PERIOD 2016 THROUGH 2018**

COUNT II

17. 40 C.F.R. § 141.86 (Monitoring requirements for lead and copper in tap water) provides requirements for monitoring lead and copper in tap water, and specifies sample site locations, sample collection methods, and the timing of monitoring.
18. For the triennial monitoring period of 2016 through 2018, Respondent failed to conduct lead and copper monitoring for the System.
19. Respondent’s failure to conduct lead and copper monitoring for the System, for the triennial monitoring period of 2016 through 2018, violated the requirements of 40 C.F.R. § 141.86(a)-(c).

COUNT III

20. 40 C.F.R. § 141.90 (Reporting requirements) requires that all water systems must report specified information, including lead and copper tap sampling results, to the State.
21. For the triennial monitoring period of 2016 through 2018, Respondent failed to report lead and copper results for the System to WVDHHR by October 10, 2018, within the triennial LCR sampling schedule, as required by 40 C.F.R. § 141.90.

22. Respondent's failure to report lead and copper results for the System, for the triennial monitoring period of 2016 through 2018, to WVDHHR by October 10, 2018, within the triennial LCR sampling schedule, violated the requirements of 40 C.F.R. § 141.90.

COUNT IV

23. 40 C.F.R. § 141.85(d) (Notification of Results) requires water systems to provide a notice of the individual tap results from lead tap water monitoring carried out under the requirements of § 141.86 to the persons served by the water system at the specific sampling site from which the sample was taken, and specifies the timing, content and delivery of the notice.
24. Respondent failed to provide notice of lead and copper results to individuals served by taps used for LCR tap monitoring, in accordance with the time, content, and delivery requirements pursuant to 40 C.F.R. § 141.85(d)(1)-(3).
25. Respondent's failure to provide notice of lead and copper results to individuals served by taps used for LCR tap monitoring, in accordance with the specified time, content, and delivery requirements violated the requirements of 40 C.F.R. § 141.85(d)(1)-(3).

COUNT V

26. 40 C.F.R. § 141.403(a)(4) (Treatment technique requirements for ground water systems) provides that, when a ground water system has significant deficiencies or is a source water fecal contamination, "[u]nless the State directs the ground water system to implement a specific corrective action, the ground water system must consult with the State regarding the appropriate corrective action within 30 days of receiving written notice from the State of a significant deficiency . . . For the purposes of this subpart, significant deficiencies include, but are not limited to, defects in design, operation, or maintenance, or a failure or malfunction of the sources, treatment, storage, or distribution system that the State determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers."
27. On September 10, 2018, WVDHHR conducted a sanitary survey at the System. On October 10, 2018, WVDHHR notified the Respondent of a significant deficiency identified during the sanitary survey. Specifically, the Monitoring, Reporting, and Data Verification element of the survey reported that the Respondent failed to conduct lead sampling and provide results within thirty (30) days of receiving the results. After WVDHHR's notification of this significant deficiency, the Respondent failed to consult with the State within 30 days of the notice of the significant deficiency, in accordance with 40 C.F.R. § 141.403(a)(4).
28. Respondent's failure to consult with WVDHHR within 30 days of receiving the notice of the significant deficiency violated the requirements of 40 C.F.R. § 141.403(a)(4).

COUNT VI

29. 40 C.F.R. § 141.404(a) (Treatment technique violations for ground water systems) provides that "[a] ground water system with a significant deficiency is in violation of the treatment technique requirement if, within 120 days (or earlier if directed by the State) of receiving written notice from the State of the significant deficiency, the system: (1) Does not complete corrective action

in accordance with any applicable State plan review processes or other State guidance and direction, including State specified interim actions and measures, or (2) Is not in compliance with a State-approved corrective action plan and schedule.”

- 30. Respondent failed to complete a corrective action and return to compliance within 120 days of notification of the significant deficiency, in accordance with 40 C.F.R. § 141.404(a).
- 31. Respondent’s failure to complete a corrective action and return to compliance within 120 days of notification of the significant deficiency violated the requirements of 40 C.F.R. § 141.404(a).

**COUNTS VII through IX
FAILURE TO CONDUCT LEAD AND COPPER MONITORING, AND
FAILURE TO REPORT AND PROVIDE NOTICE OF LEAD AND COPPER MONITORING
DURING PERIOD 2019**

- 32. As a result of the Respondent’s failure to conduct LCR monitoring for the 2016 through 2018 triennial monitoring period, the System no longer qualified to conduct LCR monitoring on a reduced basis and is required to monitor ten (10) sites annually from an approved sampling plan, in accordance with 40 C.F.R. § 141.86(c) and (d).

COUNT VII

- 33. As referenced above, 40 C.F.R. § 141.86 (Monitoring requirements for lead and copper in tap water) provides requirements for monitoring lead and copper in tap water, and specifies sample site locations, sample collection methods, and the timing of monitoring.
- 34. For the annual monitoring period of 2019, the Respondent failed to conduct lead and copper monitoring for the System, as required by 40 C.F.R. § 141.86(a)-(c).
- 35. Respondent’s failure to conduct lead and copper monitoring for the System for the annual monitoring period of 2019 violated the requirements of 40 C.F.R. § 141.86.

COUNT VIII

- 36. As referenced above, 40 C.F.R. § 141.90 (Reporting requirements) requires that all water systems must report specified information, including lead and copper tap sampling results, to the State.
- 37. For the annual monitoring period of 2019, the Respondent failed to report results to WVDHHR within the annual LCR schedule and in accordance and 40 C.F.R. § 141.90.
- 38. Respondent’s failure to report results to WVDHHR within the annual LCR schedule violated the requirements of 40 C.F.R. § 141.90.

COUNT IX

- 39. As referenced above, 40 C.F.R. § 141.85 (Public education and supplemental monitoring and mitigation requirements) requires that all water systems must deliver a notice of lead tap water

monitoring results to persons served by the water system at sites that are sampled and specifies the timing and content of this notification.

40. For the annual monitoring period of 2019, Respondent failed to provide notice of lead results to individuals served by taps used for LCR tap monitoring, in accordance with the time, content, and delivery requirements pursuant to 40 C.F.R. § 141.85(d)(1)-(3).
41. Respondent's failure to provide notice of lead results, for the annual monitoring period of 2019, to individuals served by taps used for LCR tap monitoring, in accordance with the specified time, content, and delivery requirements, violated the requirements of 40 C.F.R. § 141.85(d)(1)-(3).

**COUNTS X through XII
FAILURE TO CONDUCT LEAD AND COPPER MONITORING, AND
FAILURE TO REPORT AND PROVIDE NOTICE OF LEAD AND COPPER MONITORING
DURING PERIOD 2020**

COUNT X

42. As referenced above, 40 C.F.R. § 141.86 (Monitoring requirements for lead and copper in tap water) provides requirements for monitoring lead and copper in tap water, and specifies sample site locations, sample collection methods, and the timing of monitoring.
43. For the annual monitoring period of 2020, the Respondent failed to conduct lead and copper monitoring for the System in accordance with 40 C.F.R. § 141.86(a)-(c).
44. Respondent's failure to conduct lead and copper monitoring for the System for the annual monitoring period of 2020 violated the requirements of 40 C.F.R. § 141.86.

COUNT XI

45. As referenced above, 40 C.F.R. § 141.90 (Reporting requirements) requires that all water systems must report specified information, including lead and copper tap sampling results, to the State.
46. For the annual monitoring period of 2020, the Respondent failed to report results to WVDHHR within the annual LCR schedule as required by 40 C.F.R. § 141.90.
47. Respondent's failure to report results for the annual monitoring period of 2020 to WVDHHR within the annual LCR schedule violated the requirements of 40 C.F.R. § 141.90.

COUNT XII

48. As referenced above, 40 C.F.R. § 141.85 (Public education and supplemental monitoring and mitigation requirements) provides that all water systems must deliver a notice of lead tap water monitoring results to persons served by the water system at sites that are sampled and specifies the timing and content of this notification.

49. Respondent failed to provide notice of lead results for the annual monitoring period of 2020 to individuals served by taps used for LCR tap monitoring, in accordance with the time, content, and delivery requirements pursuant to 40 C.F.R. § 141.85(d)(1)-(3).
50. Respondent's failure to provide notice of lead results for the annual monitoring period of 2020 to individuals served by taps used for LCR tap monitoring, in accordance with the specified time, content, and delivery requirements violated the requirements of 40 C.F.R. § 141.85(d)(1)-(3).

**COUNTS XIII through XV
FAILURE TO CONDUCT LEAD AND COPPER MONITORING, AND
FAILURE TO REPORT AND PROVIDE NOTICE OF LEAD AND COPPER MONITORING
DURING PERIOD 2021**

COUNT XIII

51. As referenced above, 40 C.F.R. § 141.86 (Monitoring requirements for lead and copper in tap water) provides requirements for monitoring lead and copper in tap water, and specifies sample site locations, sample collection methods, and the timing of monitoring.
52. For the annual monitoring period of 2021, the Respondent failed to conduct lead and copper monitoring for the System, as required by 40 C.F.R. § 141.86(a)-(c).
53. Respondent's failure to conduct lead and copper monitoring for the System for the annual monitoring period of 2021 violated the requirements of 40 C.F.R. § 141.86(a)-(c).

COUNT XIV

54. As referenced above, 40 C.F.R. § 141.90 (Reporting requirements) requires that all water systems must report specified information, including lead and copper tap sampling results, to the State.
55. For the annual monitoring period of 2021, the Respondent failed to report results to WVDHHR within the annual LCR schedule as required by 40 C.F.R. § 141.90.
56. Respondent's failure to report results for the annual monitoring period of 2021 to WVDHHR within the annual LCR schedule violated the requirements of 40 C.F.R. § 141.90.

COUNT XV

57. As referenced above, 40 C.F.R. § 141.85 (Public education and supplemental monitoring and mitigation requirements) provides that all water systems must deliver a notice of lead tap water monitoring results to persons served by the water system at sites that are sampled and specifies the timing and content of this notification.
58. Respondent failed to provide notice of lead results for the annual monitoring period of 2021 to individuals served by taps used for LCR tap monitoring, in accordance with the time, content, and delivery requirements specified in 40 C.F.R. § 141.85(d)(1)-(3).

59. Respondent's failure to provide notice of lead results for the annual monitoring period of 2021 to individuals served by taps used for LCR tap monitoring, in accordance with the specified time, content, and delivery requirements violated the requirements of 40 C.F.R. § 141.85(d)(1)-(3).

III. ORDER FOR COMPLIANCE

Based on the foregoing FINDINGS, and pursuant to the authority of Section 1414(g) of the SDWA, 42 U.S.C. 42 U.S.C. § 300g-3(g), Respondent is **HEREBY ORDERED**:

60. Beginning immediately, Respondent shall comply with all the provisions of the SDWA and its implementing regulations.
61. Respondent shall implement the LCR requirements as follows:
- a. Within (10) days of the Effective Date of this Order, provide 2013 - 2015 triennial LCR tap monitoring results to individuals sampled.
 - b. Within thirty (30) days of the Effective Date of this Order, submit to WVDHHR for approval a lead and copper sampling plan that includes at least ten (10) sampling sites, selected in accordance with 40 C.F.R. § 141.86(a).
 - c. Within thirty (30) days of sampling plan approval, implement the plan and conduct lead and copper sampling and analysis at a minimum of ten (10) sampling sites.
 - d. As soon as practicable but no later than thirty (30) days after learning the tap monitoring results, provide lead and copper monitoring results to individuals with taps that were sampled that do not exceed 15 micrograms per liter (ug/L) of lead. As soon as practicable but no later than three (3) days after learning the tap monitoring results, provide lead and copper monitoring results to individuals with taps that were sampled that exceed 15ug/L of lead.
62. Any documentation, plans, reports, and analyses required by Paragraph 62 shall be submitted simultaneously, via electronic mail, to:

Ms. Leah Zedella
SDWA & Wetlands Section (3ED31)
Enforcement & Compliance Assurance Division
U.S. Environmental Protection Agency, Region III
(215) 814-2838
zedella.leah@epa.gov

and

Mr. Dan J. Mace
Compliance and Enforcement
West Virginia Department of Health and Human Resources
(304) 352-5023

dan.j.mace@wv.gov

IV. GENERAL PROVISIONS

63. The following certification must accompany each submission by Respondent pursuant to this Order and must be signed by a Representative of Respondent authorized to sign on behalf of Respondent:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signed:

Title:

Date:

64. Respondent's failure to comply with all of the requirements of the Act, 40 C.F.R. Part 141, and milestones required under this Order, may subject Respondent to administrative penalties of up to \$43,678 per day for each day of violation that occurs, or a judicial action including the imposition of civil penalties up to \$62,689, pursuant to Section 1414(g) of the SDWA, 42 U.S.C. § 300g-3(g), as modified by the Debt Collection Improvement Act of 1996, 31 U. S. C. § 3701 et seq., and subsequent Civil Monetary Penalty Inflation Adjustment Rule, 40 C.F.R. Part 19.
65. EPA reserves the right to commence action against any person, including Respondent, in response to any condition which EPA determines may present an imminent and substantial endangerment to the public health.
66. Any request for modification of this Order must be in writing and must be approved by EPA.
67. This Order shall not prohibit, prevent, or otherwise preclude EPA from taking whatever action it deems appropriate to enforce the Act in any matter and shall not prohibit, prevent, or otherwise preclude EPA from relying on this Order in subsequent administrative proceedings.
68. This Order does not waive, suspend, or modify the requirements of the SDWA, 42 U.S.C. §§ 300f - 300j-26, or its implementing regulations found in 40 C.F.R. Part 141, which remain in full force and effect. Issuance of this Order is not an election by the EPA to forgo any civil action otherwise authorized under the SDWA.

69. This Order in no way relieves the Respondent of the duty to comply with any federal, state, or local law, regulation, ordinance, or permit. Compliance with this Order shall be no defense to any action commenced pursuant to such authorities.
70. Pursuant to its authority under 42 U.S.C. § 300j-4(b)(1), EPA and its authorized representatives, including contractors, shall have authority upon the presentation of proper identification to enter the premises of Respondent at any time without prior notification to monitor the activities required by this Order, verify any data or information submitted pursuant to this Order, obtain samples, and inspect and review any records generated and/or maintained pursuant to this Order. EPA reserves and does not waive all existing inspection and information request authority.
71. The provisions of this Order shall apply to and be binding upon the Respondent and its officers, directors, employees, contractors, agents, trustees, successors and assigns of the Respondent.
72. Respondent may seek federal judicial review of the Order pursuant to Section 1448(a) of the SDWA, 42 U.S.C. § 300j-7(a).

V. OPPORTUNITY TO CONFER

73. Respondent is invited to confer with the Agency about the findings and conclusions reflected in this Order including the terms and conditions contained herein. Respondent's request for a conference must be in writing via e-mail within ten (10) days of receipt of this Order. Respondent must communicate with EPA representatives to schedule the conference no later than 20 days after receipt of this Order. If the requested conference is held, this Order shall become effective ten (10) days after the conference is held. If Respondent does not request a meeting within ten (10) days of receipt of this Order, Respondent waives its right to a conference, and this Order shall become effective ten (10) days from its receipt. Any request for a conference, or other inquiries concerning this Order, should be made in writing to: Natalie L. Katz, Senior Assistant Regional Counsel, at katz.natalie@epa.gov.

VI. TERMINATION AND SATISFACTION

74. The provisions of this Order shall be deemed satisfied when Respondent receives written notice from EPA that Respondent has demonstrated, to the satisfaction of EPA, that the terms of this Order have been satisfactorily completed and the written notice will state that this Order is terminated.
75. Respondent may submit to EPA a Certification of Compliance and Request for Termination of this Order, including documentation to demonstrate that it has met all requirements of this Order. If, following review of any Certification of Compliance and Request for Termination of this Order, EPA agrees that Respondent has adequately complied with all requirements of this Order, EPA shall provide written notification of termination of this Order, as described in Paragraph 74.

VII. EFFECTIVE DATE

76. The effective date of this Order shall be ten (10) days from the date of receipt of this Order, or, if a conference is requested per Section V above, this Order shall become effective ten (10) days after the conference is held.

VIII. NOTICE OF INTENT TO COMPLY

77. Within ten (10) days of the effective date of this Order, Respondent shall submit to EPA via e-mail a Notice of Intent to Comply with the Order. Respondent shall submit the Notice shall to:

Leah Zedella
SDWA/Wetlands Section
Enforcement & Compliance Assurance Division
United States Environmental Protection Agency, Region III
zedella.leah@epa.gov

and

Natalie Katz
Senior Assistant Regional Counsel
Office of Regional Counsel
United States Environmental Protection Agency, Region III
katz.natalie@epa.gov

SO ORDERED.

[Electronic Signature and Date]
Karen Melvin, Director
Enforcement & Compliance Assurance Division
U.S. EPA, Region III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Philadelphia, Pennsylvania 19103

In the Matter of:	:	
	:	
PWS ID WV3305508	:	ADMINISTRATIVE ORDER
GLEN ROGERS PUBLIC SERVICE DISTRICT	:	
c/o RAVENCLIFF, MCGRAWS, SAULSVILLE	:	U.S. EPA Docket No. SDWA-03-2022-0056DS
PUBLIC SERVICE DISTRICT	:	
4200 POPLAR GAP ROAD	:	Proceeding under Section 1414(g) of the
GLEN FORK, WYOMING COUNTY	:	Safe Drinking Water Act, as amended,
WEST VIRGINIA 25845	:	42 U.S.C. § 300g-3(g)
	:	
Respondent,	:	
	:	
GLEN ROGERS PUBLIC SYSTEM	:	
	:	
System.	:	

CERTIFICATE OF SERVICE

I certify that on _____, the foregoing Administrative Order, was sent to the following persons by UPS Overnight Mail, at the following address:

Glen Rogers Public Service District
c/o Ravenscliff, McGraws, Saulsville Public
Service District
4200 Poplar Gap Road
Glen Fork, Wyoming County
West Virginia 25845
patsfashions@aol.com
rmspsd@jetbroadband.com

Susan J. Riggs, Esq.
Spilman, Thomas & Battle
300 Kanawha Boulevard, East
Charleston, WV 25301
sriggs@spilmanlaw.com

I certify that the enclosed Administrative Order was sent to the following person by electronic mail, at the following addresses.

Regional Hearing Clerk (3RC00)
U.S. Environmental Protection Agency, Region III
Email: R3_Hearing_Clerk@epa.gov

I have also arranged for the Regional Hearing Clerk to distribute the Administrative Order by electronic mail to the persons listed above, and to the EPA staff listed below:

Natalie Katz
Senior Assistant Regional Counsel
U.S. EPA, Region III
katz.natalie@epa.gov

Leah Zedella
SDWA Inspector
U.S. EPA, Region III
zedella.leah@epa.gov

Date: _____

[Electronic Signature and Date]
U.S. Environmental Protection Agency, Region III