



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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**MAR 05 2018**

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FILED  
EPA REGION VIII  
HEARING CLERK

Ref: 8WP-SUI

Walter Hodgson  
LT Campgrounds, LLC d/b/a  
Custer/Mount Rushmore KOA  
361 E. Highland Avenue  
Sierra Madre, California 91024

RE: CLASS V UIC PROGRAM  
Rule Authorization: Large Capacity Septic System  
LT Campgrounds, LLC d/b/a Custer/Mount Rushmore KOA  
Administrative Order on Consent (Docket Number SDWA-08-2016-0011)

Dear Mr. Hodgson:

The Administrative Order on Consent (AOC) filed on June 15, 2016, that you signed and agreed to, required submission of a compliance plan to the Environmental Protection Agency (EPA) for approval. As you may recall, the EPA asked that you enlarge the size of your leach field in addition to enlarging the size of the septic tanks due to concerns the facility may be discharging non-sanitary wastes from the RV dump station. You did not agree to the enlargement of the leach field. On November 16, 2016, a letter was sent to you as a result of discussions with the EPA where you agreed to sample your system during the months of May through September, 2017 through 2019, to ensure that the leach field is working properly. The list of required constituents (i.e., contaminants that needed to be sampled for) and sampling methods was enclosed with that letter. On August 4 and 25, 2017, the EPA sent emails to you inquiring about the sample results for the previous months. EPA received some preliminary sample results from your laboratory on November 7, 2017. However, EPA has not received final sample results for *all* constituents for the months of May, June, July, August and September 2017. If you did properly sample, please send the aforementioned sampling results directly to Ms. Britta Copt at [copt.britta@epa.gov](mailto:copt.britta@epa.gov) or to the mailing address at the top of this letter and include mail code 8ENF-W-SDW.

Please be advised that your Class V disposal system is currently "authorized by rule" in accordance with 40 CFR Sections 144.24 and 144.84(a) that allows you to operate your Class V disposal system without a full permit. Your Class V disposal system(s) must comply with, among other requirements, 40 CFR Section 144.12(a) that prohibits any underground injection that may endanger an underground source of drinking water (see enclosure). Your Class V disposal system is also subject to periodic compliance inspections, which may include sampling and analysis of your fluids to ensure this Class V disposal



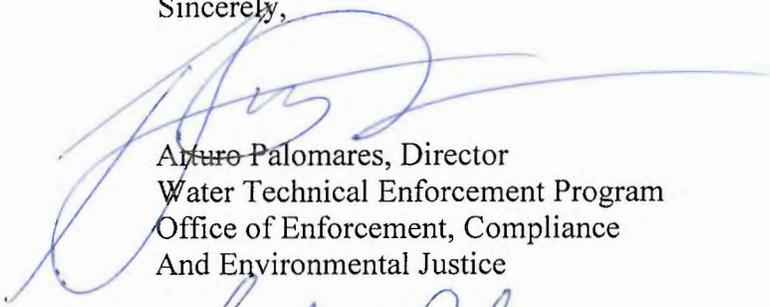
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system is not potentially endangering local underground sources of drinking water. Finally, be aware that under 40 CFR Sections 144.12(c), (d), and (e), the EPA can require you to apply for a permit or close your disposal system(s) under certain circumstances (e.g., if you fail to comply with a written request from the UIC Program Director within the time frame specified).

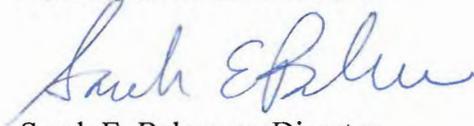
We prefer to resolve problems before such action(s) are taken and ask for your prompt response and cooperation. We want to work with you to ensure your facility remains in compliance with the AOC and is not endangering local underground sources of drinking water. As a reminder, you are required to monitor for the complete list of constituents included in the AOC during the months of May through September in 2018 and 2019. Additionally, for any months where you did not sample the septic system effluent for all the required constituents in 2017, you will now need to sample for the constituents and months missed in 2020 to ensure the leach field is working properly. Sample results are due to EPA by the end of the next month after the sample collection date (i.e., results for samples collected in May 2018 are due by the end of the month in June 2018). If you have any questions regarding your sampling requirements or the AOC, please contact Britta Copt at (800) 227-8917, extension 312-6229 or 303-312-6229.

Please contact Omar Sierra-Lopez at (800) 227-8917, extension 312-7045 or (303) 312-7045 if you have any questions or need more information pertaining to your authorized by rule designation. Additional information on the EPA UIC Class V program can also be found online at: <https://www.epa.gov/uic>.

Sincerely,



Arturo Palomares, Director  
Water Technical Enforcement Program  
Office of Enforcement, Compliance  
And Environmental Justice



Sarah E. Bahrman, Director  
Safe Drinking Water Program  
Office of Water Protection

Enclosure

cc: Walter Hodgson, Owner ([walter@custerkoa.com](mailto:walter@custerkoa.com))  
Brian Walsh, Environmental Scientist Manager, SD DENR ([brian.walsh@state.sd.us](mailto:brian.walsh@state.sd.us))  
Mark Meyer, Drinking Water Program Administrator, SD DENR ([mark.mayer@state.sd.us](mailto:mark.mayer@state.sd.us))

### List of Constituents to be analyzed

All analytical testing must be done in a state certified laboratory to ensure that permit limits can be met

#### Metals

Parameter Name	Permit Limit (mg/L)	Standard Type	Analytical Methods
Antimony	0.006	MCL	EPA 200.8, 200.9
Arsenic	0.01	MCL	EPA 200.7, 200.8, 200.9
Barium	2	MCL	EPA 200.7, 200.8
Beryllium	0.004	MCL	EPA 200.7, 200.8, 200.9
Boron	6	HA-Lifetime	EPA 200.7, 212.3
Cadmium	0.005	MCL	EPA 200.7, 200.8, 200.9
Chromium(total)	0.1	MCL	EPA 200.7, 200.8, 200.9
Copper	1.3	MCL-TT	EPA 200.7, 200.8, 200.9
Iron	5	Region 8 Permit Limit	EPA 200.7, 200.9
Lead	0.015	MCL-TT	EPA 200.8, 200.9
Manganese	0.3	HA-Lifetime	EPA 200.7, 200.8, 200.9
Mercury (inorganic)	0.002	MCL	EPA 245.1, 245.2, 200.8
Molybdenum	0.04	HA-Lifetime	EPA 200.7, 246.1, 246.2
Nickel	0.1	HA-Lifetime	EPA 200.7, 200.8, 200.9
Selenium	0.05	MCL	EPA 200.8, 200.9
Silver	0.1	HA-Lifetime	EPA 200.7, 200.8, 200.9
Strontium	4	HA-Lifetime	EPA 272.1, 272.2, 200.7
Thallium	0.002	MCL	EPA 200.8, 200.9
Zinc	2	HA-Lifetime	EPA 200.7, 200.8

## Inorganics

Parameter Name	Permit Limit	Standard Type	Analytical Methods
Ammonia	30 mg/L	HA-Lifetime	EPA 350.1, 350.2, 350.3
Asbestos (fibers/1>10µm in length)	7 million fibers/L	MCL	EPA 100.1,100.2
Cyanide	0.2 mg/L	MCL	EPA 335.4
Fluoride	4 mg/L	MCL	EPA 300.0
Nitrate (as N)	10 mg/L	MCL	EPA 300.0
Nitrate-Nitrite (both as N)	10 mg/L	MCL	EPA 300.0
Nitrite (as N)	1 mg/L	MCL	EPA 300.0

## Volatile Organics using EPA Method 524.2 or 8260

Parameter Name	CAS No	Permit Limit (mg/L)	Standard Type
1,1,1,2-Tetrachloroethane	630-20-6	0.07	HA-Lifetime
1,1,1-Trichloroethane	71-55-6	0.2	MCL
1,1,2,2-Tetrachloroethane	79-34-5	0.04	Region 8 Permit Limit 10 <sup>-4</sup> Cancer Risk
1,1,2-Trichloroethane	79-00-5	0.005	MCL
1,1-Dichloroethylene	75-35-4	0.007	MCL
1,2-(cis)Dichloroethylene	156-59-2	0.07	MCL
1,2-(trans)Dichloroethylene	156-60-5	0.1	MCL
1,2,3-Trichloropropane	96-18-4	0.02	Region 8 Permit Limit
1,2,4-Trichlorobenzene	120-82-1	0.07	MCL
1,2-Dibromomethane (Ethylene Dibromide EDB)	106-93-4	0.00005	MCL
1,2-Dichlorobenzene o-	95-50-1	0.6	MCL
1,2-Dichloroethane	107-06-2	0.005	MCL
1,2-Dichloropropane	78-87-5	0.005	MCL
1,3-Dichlorobenzene m-	541-73-1	0.6	HA-Lifetime
1,4-Dichlorobenzene p-	106-46-7	0.075	MCL
2-Chlorotoluene (o-)	95-49-8	0.1	HA-Lifetime
4-Chlorotoluene (p-)	106-43-4	0.1	HA-Lifetime
Acetone	67-64-1	6	Region 8 Permit Limit
Acrylonitrile	107-13-1	0.006	Region 8 Permit Limit 10 <sup>-4</sup> Cancer Risk
Benzene	71-43-2	0.005	MCL
Bromobenzene	108-86-1	0.06	HA-Lifetime
Bromochloromethane	74-97-5	0.09	HA-Lifetime
Bromodichloromethane (THM)	75-27-4	0.02	Region 8 Permit Limit
Bromoform (THM)	75-25-2	0.2	Region 8 Permit Limit
Bromomethane	74-83-9	0.01	HA-Lifetime

Parameter Name	CAS No	Permit Limit (mg/L)	Standard Type
Carbon tetrachloride	56-23-5	0.005	MCL
Chlorobenzene (Monochlorobenzene)	108-90-7	0.1	MCL
Chlorodibromomethane (Dibromochloromethane) (THM)	124-48-1	0.06	HA-Lifetime
Chloroform (THM)	67-66-3	0.07	HA-Lifetime
Chloromethane	74-87-3	0.4	10-day HA for a 10 kg child
Cyanogen Chloride (testing not needed if cyanide is present in source water and alkaline chlorination is used, pH 8.5)	506-77-4	0.4	Region 8 Permit Limit
Dichlorodifluoromethane	75-71-8	1	HA-Lifetime
Dichloromethane (Methylene chloride)	75-09-2	0.005	MCL
Ethylbenzene	100-41-4	0.7	MCL
Hexachlorobutadiene	87-68-3	0.002	Region 8 Permit Limit
Hexachloroethane	67-72-1	0.001	HA-Lifetime
Isopropylbenzene (cumene)	98-82-8	0.8	Region 8 Permit Limit
Methyl Ethyl Ketone	78-93-3	4	HA-Lifetime
Naphthalene	91-20-3	0.1	HA-Lifetime
Perchloroethylene (PCE) (Tetrachloroethylene)	127-18-4	0.005	MCL
Styrene	100-42-5	0.1	MCL
Toluene	108-88-3	1	MCL
Total Trihalomethanes		0.08	MCL
Trichloroethylene (TCE)	79-01-6	0.005	MCL
Trichlorofluoromethane	75-69-4	2	HA-Lifetime
Vinyl chloride	75-01-4	0.002	MCL
Total Xylenes	1330-20-7	10	MCL

#### Disinfectants and Disinfection Byproducts

Parameter Name	Permit Limit (mg/L)	Standard Type	Analytical Method
Bromate	0.01	MCL	EPA 317.0, Revision 2 321.8, 326.0
Chloramine (as free chlorine)	4	MCL	
Chlorine (free chlorine, combined)	4	MCL	Standard Methods 20 <sup>th</sup> edition: 4500-CI D 4500-CI F 4500-CI G 4500-CI H
Chlorine dioxide	0.8	MCL	EPA 327, Revision 1 Standard Method 20 <sup>th</sup> edition:

Parameter Name	Permit Limit (mg/L)	Standard Type	Analytical Method
			4500-ClO <sub>2</sub> D 4500-ClO <sub>2</sub> E
Chlorite	1.0	MCL	EPA 300.0, 300.1
Total Haloacetic Acids (HAA5s) Bromoacetic acid Dibromoacetic acid Dichloroacetic acid Monochloroacetic acid Trichloroacetic acid	0.06	MCL	EPA 552.3
Total Trihalomethanes (TTHMs) Chloroform Bromodichloromethane Dibromochloromethane Bromoform	0.08	MCL	EPA 502.2, 524.2
N-nitroso-dimethylamine (NDMA)	NA		EPA 521
N-nitroso-diethylamine (NDEA)	NA		EPA 521
N-nitroso-di-n-butylamine (NDBA)	NA		EPA 521
N-nitroso-di-n-propylamine (NDPA)	NA		EPA 521
N-nitroso-methylethylamine (NMEA)	NA		EPA 521
N-nitroso-pyrrolidine (NPYR)	NA		EPA 521

**MCL:** Maximum Contaminant Level. The highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLG as feasible using the best available analytical and treatment technologies and taking cost into consideration. MCLs are enforceable standards.

**MCLG:** Maximum Contaminant Level Goal. A non-enforceable health goal which is set at a level at which no known or anticipated adverse effect on the health of persons occurs and which allows an adequate margin of safety.

**TT:** Treatment Technique. A required process intended to reduce the level of a contaminant in drinking water.

**HA:** Health Advisory. An estimate of acceptable drinking water levels for a chemical substance based on health effects information; a Health Advisory is not a legally enforceable Federal standard, but serves as technical guidance to assist Federal, State, and local officials.

**HA-Lifetime:** The concentration of a chemical in drinking water that is not expected to cause any adverse non-carcinogenic effects for a lifetime of exposure. The Lifetime HA is based on exposure of a 70-kg adult consuming 2 liters of water per day. The Lifetime HA for Group C carcinogens includes an adjustment for possible carcinogenicity.

**Region 8 Permit Limit:** Permit limit calculated by Region 8 Drinking Water Toxicologist based on human health criteria.

**10<sup>-4</sup> Cancer Risk:** The concentration of a chemical in drinking water corresponding to an excess estimated lifetime cancer risk of 1 in 10,000

**HA-Ten Day:** The concentration of a chemical in drinking water that is not expected to cause any adverse non-carcinogenic effects for up to ten days of exposure for a 10 kg child consuming 1 liter per day.