

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

FILED

Aug 28, 2025

8:17 am

U.S. EPA REGION 8
HEARING CLERK

IN THE MATTER OF:

LLN Limited LLC,

Respondent.

Green River Bar Public Water System
PWS ID #WY5601726

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Docket No. SDWA-08-2025-0036

ADMINISTRATIVE ORDER

1. This Order is issued under the authority vested in the Administrator of the United States 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 official.
2. LLN Limited LLC (Respondent) is a Wyoming corporation that owns and operates the Green River Bar Public Water System (System), which provides piped water to the public in Sublette County, Wyoming, for human consumption.
3. The System is supplied by a groundwater source accessed via one well. The water is untreated.
4. The System has approximately one service connection and regularly serves an average of approximately 26 individuals daily at least 60 calendar days out of the year. Therefore, the System is a “public water system” as defined in section 1401(4) of the Act, 42 U.S.C. § 300f(4), and 40 C.F.R. § 141.2. Further, the System is a non-community water system that does not regularly serve at least 25 of the same persons over six months per year and, as such, is also a “transient non-community water system” as defined in 40 C.F.R. § 141.2.
5. Respondent is a “person” as defined in section 1401(12) of the Act, 42 U.S.C. § 300f(12) and is subject to the Act and 40 C.F.R. part 141 (Part 141). Part 141 is an “applicable requirement” as defined in section 1414(i) of the Act, 42 U.S.C. § 300g-3(i).

VIOLATIONS

6. If the System has more than one positive total coliform sample result within the same month or fails to take three total coliform repeat samples within 24 hours following a routine total coliform positive result, Respondent is required to conduct a Level 1 assessment and submit it to the EPA within 30 calendar days of learning

of the monitoring results. 40 C.F.R. § 141.859. Respondent failed to conduct a Level 1 Assessment following multiple positive total coliform sample results in the month of October of 2023 and therefore, violated this requirement.

7. Respondent is required to correct any sanitary defect found through a Level 2 Assessment in compliance with an EPA-approved schedule and, further, must notify the EPA when each scheduled corrective action is completed. 40 C.F.R. § 141.859(c). The EPA's record reflects that Respondent failed to timely correct all sanitary defects found during a Level 2 Assessment conducted December 6, 2023, and failed to notify the EPA of corrective action completion and therefore, violated these requirements.
8. Respondent is required to notify the public of certain violations of Part 141 and, within 10 calendar days after completing public notice, provide a copy of the public notice and certification to the EPA. 40 C.F.R. §§ 141.31(d) and 141.201-141.211. The violations identified in paragraphs 6 and 7, above, are classified as violations requiring Tier 2 public notice within 30 calendar days, with the public notice to be repeated every three months and for notice to remain in place for as long as the violation or situation persists, according to 40 C.F.R. § 141.203. The EPA's records reflect that the Respondent failed to notify the public of the violations cited in paragraphs 6 and 7, and failed to submit a copy of the public notice and certification to the EPA and therefore, violated this requirement.
9. Respondent is required to report any failure to comply with any Part 141 to the EPA within 48 hours (except where Part 141 specifies a different time period). 40 C.F.R. § 141.31(b). Respondent failed to report the violations cited in paragraphs 6 and 7, above, to the EPA and therefore, violated this requirement.

ORDER

Respondent is ordered to perform the following actions upon Respondent's receipt of this Order (unless a different deadline is specified below):

10. Respondent is ordered to comply with all provisions of the Act and Part 141, including but not limited to each requirement cited above.
11. Within 15 calendar days of receipt of this Order, Respondent shall conduct a Level 1

Assessment and submit the attached Revised Total Coliform Rule Level 1 Assessment form to the EPA. The assessment shall determine the cause of the total coliform positive samples, identify corrective actions for all sanitary defects, and include a proposed schedule (Schedule) and plan for completion of all corrective actions after consulting with the EPA. The Schedule shall be incorporated into this Order with each milestone to be an enforceable requirement upon written approval by the EPA. Within 10 calendar days after completing all tasks included in the Schedule, Respondent shall notify the EPA of the project's completion. Respondent shall provide sufficient evidence to the EPA, including photographs of the corrective actions. 40 C.F.R. § 141.859.

12. Following any future instances of the System (1) having two or more total coliform-positive sample results (including routine and repeat samples) within the same month, (2) failing to collect three repeat samples within 24 hours following a total coliform-positive sample, (3) having an *E. coli* MCL violation, or (4) triggering a second Level 1 Assessment within a rolling 12-month period, Respondent shall conduct the appropriate level of assessment in compliance with 40 C.F.R. § 141.859.
13. Within 30 calendar days of receipt of this Order, Respondent shall consult with the EPA regarding implementation of the necessary corrective actions outlined below and shall submit to the EPA a schedule for completion of all corrective actions. Upon written approval by the EPA, the-approved schedule (Schedule) shall be incorporated into this Order as an enforceable requirement. Within 10 calendar days after completing all tasks included in the Schedule, Respondent shall notify the EPA of the project's completion. Respondent shall provide sufficient evidence to the EPA including photographs of the corrective actions. Thereafter, Respondent shall comply with all provisions of 40 C.F.R. § 141.859(c) regarding any identified sanitary defects at the System.

Corrective Actions:

- 6.1: Send a close-up photo of the well cap and sanitary seal for the unpermitted well.
- 6.2: Send photos of the electrical junction and well cap of the unpermitted

well. The photos should show each side of the junction attached to the well and a straight on view of the junction.

- 6.23: File a Change Form with EPA for the new source. Template and instructions are available at: <https://www.epa.gov/region8-waterops/epa-r8-public-water-system-inventory-change-form>.

14. Within 30 calendar days after receipt of this Order, and quarterly thereafter as long as the violations cited in paragraphs 6 and 7, above, persist, Respondent shall notify the public of these violations. Thereafter, following any future violation of Part 141, Respondent shall comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 calendar days after providing public notice, Respondent shall submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d). Templates and instructions are available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#pn>.
15. Respondent shall report any violation of Part 141 to the EPA within 48 hours of the violation occurring, as required by 40 C.F.R. § 141.31(b). However, if a different time period for reporting is specified in this Order or Part 141, Respondent shall report within that different period.
16. If the population served by the System at least 60 days of the year falls below 25 individuals, Respondent must notify the EPA in writing within 10 calendar days by submitting a completed basic information form. The form is available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#new>.
17. If Respondent (a) leases or sells the System to another person or entity, or (b) contracts with or hires any other person or entity to operate the System, Respondent must, within 10 calendar days, provide a copy of this Order to the lessee, purchaser, or contractor and notify the EPA in writing of the change. In either of these circumstances, Respondent will remain obligated to comply with this Order.
18. Respondent must send all reporting and notifications required by this Order to the

EPA at:

Email: R8DWU@epa.gov, and latino.steven@epa.gov

GENERAL PROVISIONS

19. This Order is binding on Respondent, Respondent's assigns and heirs, and any person (*e.g.*, employee, contractor, or other agent) acting in concert with Respondent.
20. This Order does not constitute a waiver, suspension, or modification of any requirement of the Act or Part 141. Issuance of this Order is not an election by the EPA to forgo any civil or criminal action.
21. Violation of any part of this Order, the Act, or Part 141 may subject Respondent to a civil penalty of up to \$71,545 (as adjusted for inflation) per day of violation, a court injunction ordering compliance, or both. 42 U.S.C. § 300g-3; 40 C.F.R. part 19; 90 Fed. Reg. at 1375 (January 8, 2025).
22. Respondent may seek federal judicial review of this Order pursuant to section 1448(a) of the Act, 42 U.S.C. § 300j-7(a).

Issued: August 26, 2025.

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