



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

SEP 13 2016

Ref: 8ENF-W

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joel K. Brown, Registered Agent
RHP Properties, Inc.
31200 Northwestern Highway
Farmington Hills, Michigan 48334

C T Corporation System, Registered Agent
Hidden Hills, LLC
31200 Northwestern Highway
Farmington Hills, Michigan 48334

Docket No.: SDWA-08-2016-0021

Re: Administrative Order issued to RHP Properties, Inc. and Hidden Hills LLC, owners of the Hidden Hills Mobile Home Park Public Water System, PWS ID# WY5601339

Dear Mr. Brown and C T Corporation System:

Enclosed is an Administrative Order (Order) 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). Among other things, the Order alleges that RHP Properties, Inc. and Hidden Hills LLC (Companies), as owners and/or operators of the Hidden Hills Mobile Home Park Public Water System (System), have violated the National Primary Drinking Water Regulations at 40 C.F.R. part 141 (Drinking Water Regulations).

The Order is effective upon the date received. Please review the Order and within 10 days provide the EPA with any pertinent information you believe the EPA may not have (e.g., any monitoring that may have been done but not submitted, any public notices issued but not provided to the EPA, any updates to the numbers of connections and/or individuals served).


If the Companies comply with the Order, the EPA may close the Order without further action. Failure to comply with the Order may lead to substantial civil penalties and/or a federal court injunction ordering compliance.

If you have any questions or to request an informal conference with the EPA, please contact Jill Minter at the above address (with the mailcode 8ENF-W), via email at minter.jill@epa.gov or by phone at (800) 227-8917, extension 6084, or (303) 312-6084. Any questions from the Companies' attorney should be directed to Mia Bearley, Enforcement Attorney, who may be reached at the above address (with the

mailcode 8ENF-L), via email at bearley.mia@epa.gov, or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

We urge your prompt attention to this matter.

Sincerely,



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

Enclosures

cc: WY DEQ/DOH (via email)
Ms. Missy Haniewicz, EPA Regional Hearing Clerk
Mr. Darren Mizokami, Contract Operator, Hidden Hills MHP Public Water System (via email)
Ms. Kim Humiston, Property Manager, Hidden Hills MHP (via email)
Ms. Karen Vreeland, Operations Manager, RHP Properties, Inc. (via email)



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SEP 13 2016

Ref: 8ENF-W

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Natrona County Commissioners
c/o Forrest Chadwick, Chairman
Natrona County Courthouse
200 North Center
Casper, Wyoming 82601

Docket No.: SDWA-08-2016-0021

Re: Notice of Safe Drinking Water Act Enforcement Action against the Hidden Hills Mobile Home Park Public Water System, PWS ID# WY5601339

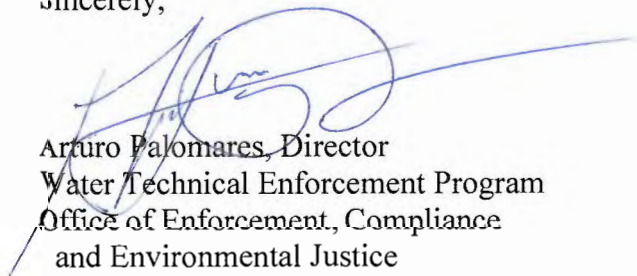
Dear Commissioners:

The Safe Drinking Water Act requires that the U.S. Environmental Protection Agency notify locally elected officials of certain enforcement actions taken in their area.

An Administrative Order (Order) is being issued to RHP Properties, Inc. and Hidden Hills LLC, which own and/or operate the Hidden Hills Mobile Home Park Public Water System, located in Natrona County, Wyoming. The Order directs RHP Properties, Inc. and Hidden Hills LLC to comply with the National Primary Drinking Water Regulations. Violations alleged in the Order include failing to monitor for total coliform bacteria, failing to timely notify the public of certain violations and failing to report certain violations to the EPA.

For more details, a copy of the Order is enclosed. **The Order does not require any response or action by the County Commission.** If you have any questions regarding this Order, please contact Jill Minter at minter.jill@epa.gov or (303) 312-6084.

Sincerely,


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

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2016 SEP 13 PM 2:53

IN THE MATTER OF:)
)
RHP Properties, Inc. and)
Hidden Hills LLC,)
)
)
Respondents.)

Docket No. ~~SDWA-08-2016-0021~~

ADMINISTRATIVE ORDER

FILED
EPA REGION VIII
HEARING CLERK

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 officials.
2. RHP Properties, Inc. is a Michigan corporation and Hidden Hills LLC is a Wyoming corporation (Respondents). Respondents own and/or operate the Hidden Hills Mobile Home Park Public Water System (System), which provides piped water to the public in Natrona County, Wyoming, for human consumption.
3. The System is a consecutive system that purchases water from the Central Wyoming Regional Water System Joint Powers Board and is supplied by the City of Casper Water System. The City of Casper uses a groundwater source accessed by a well field consisting of 26 wells and 3 caissons which have been determined to be under the direct influence of surface water. The well field combined water is treated with ozone and sodium hypochlorite prior to storage. After storage, ammonia is added to form chloramines along with a corrosion inhibitor. During high demand, the Platte River is an additional water source. Platte River water is treated using flocculation, sedimentation, disinfection with ozone, and filtration and, after storage, chloramines and a corrosion inhibitor are added. There is no booster disinfection in the City of Casper Water System. Water entering the System carries a chloramine residual.
4. The System has approximately 128 service connections used by year-round residents and/or regularly serves an average of approximately 320 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.
5. 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).
6. The Drinking Water Regulations include monitoring requirements. The EPA has sent Respondents annual notifications of the specific monitoring requirements that apply to the System.

VIOLATIONS

7. Within 24 hours of being notified that a routine sample of the System’s water is positive for total coliform, Respondents are required to collect a set of 4 repeat samples. 40 C.F.R. § 141.21(b). Respondents failed to take any repeat samples within 24 hours of being notified of a positive total

coliform result taken on January 12, 2015, and, therefore, violated this requirement. Effective April 1, 2016, three repeat samples are required for each total coliform positive result. 40 C.F.R. § 141.858.

8. If the System has one or more sampling results that are positive for total coliform, Respondents are required to collect at least five routine samples during the next month the system provides water to the public. 40 C.F.R. § 141.21(b)(5). After the System's water tested positive for total coliform on January 12, 2015, Respondents failed to take at least five routine samples of the System's water in February 2015 and, therefore, violated this requirement. The System took 1 of 5 required samples. Additional routine sampling is no longer required after April 1, 2016.

9. 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 Tier 3 violations cited in paragraphs 7 and 8, above, within one year of the violations, and, therefore, violated this requirement. 40 C.F.R. § 141.204(b)(1). The System did notify the public of the failure to take repeat samples violation, cited in paragraph 7, above, in the 2015 Annual Consumer Confidence Report, which was certified on June 13, 2016, and submitted to the EPA on June 22, 2016.

10. Respondents are required to report any failure to comply with any coliform monitoring requirement to the EPA within 10 days after discovering the violation. 40 C.F.R. § 141.21(g)(2). Respondents failed to report the violations cited in paragraphs 7 and 8, above, to EPA and, therefore, violated this requirement.

11. 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 violation cited in paragraph 9, 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):

12. In compliance with the Revised Total Coliform Rule, Respondents shall monitor the System's water monthly for total coliform bacteria and, if any sample is positive for total coliform, collect 3 repeat samples as required by 40 C.F.R. § 141.858. Respondents shall report analytical results to the EPA within the first 10 days following the month in which Respondents receive sample results, as required by 40 C.F.R. § 141.31(a).

13. In compliance with the Revised Total Coliform Rule, if the System (1) has more than one positive total coliform sample result (including routine and repeat samples) within the same month, or (2) fails to collect three repeat samples following a total coliform positive sample, Respondents shall conduct a Level 1 assessment within 30 days of learning of the violation (the "trigger date") to



determine the cause of the total coliform positive samples. 40 C.F.R. § 141.859. The Level 1 assessment must, among other requirements, identify corrective action for any sanitary defects identified in the assessment.

14. 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.

15. Respondents shall report any violation of 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).

16. 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.

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

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

19. Respondents shall send all reporting and notifications required by this Order in writing to:

U.S. EPA Region 8 (8P-W-DW)
1595 Wynkoop Street
Denver, Colorado 80202-1129
Email: R8DWU@epa.gov
Fax: (877) 876-9101

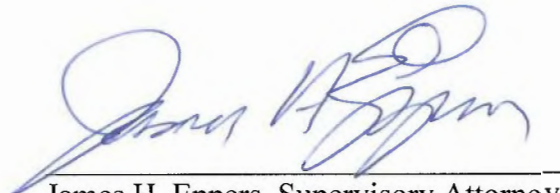
GENERAL PROVISIONS

20. 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.

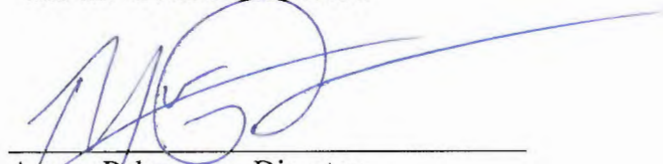


21. Violation of any part of this Order or the Drinking Water Regulations may subject Respondents to a civil penalty of up to \$37,500 (as adjusted for inflation) per day of violation. 42 U.S.C. § 300g-3; 40 C.F.R. part 19.
22. Respondents may seek federal judicial review of this Order pursuant to section 1448(a) of the Safe Drinking Water Act, 42 U.S.C. § 300j-7(a).
23. This Order is effective upon receipt by Respondents and will continue to be in effect until closed by the EPA.

Issued: September 13, 2016



James H. Eppers, Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice



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

