



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Phone 800-227-8917  
<http://www.epa.gov/region08>

December 21, 2020

Ref: 8ENF-W-SD

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

December 23, 2020  
4:42 PM

Received by

EPA Region VIII

Hearing Clerk

Mr. Joshua Haacke, Director of Support Services  
Crossroads of the West Council  
Boy Scouts of America  
[joshua.haacke@scouting.org](mailto:joshua.haacke@scouting.org)

Mr. Jeremy Bell, Camping Director  
Teton High Adventure Base Camp  
[jeremy.bell@scouting.org](mailto:jeremy.bell@scouting.org)

Re: Emergency Administrative Order Addendum, Crossroads of the West Council, Boy Scouts of America, regarding the Teton High Adventure Base Public Water System, PWS ID # WY5601241, Docket # **SDWA-08-2020-0035**

Dear Mr. Haacke and Mr. Bell:

This is an Addendum to the Emergency Administrative Order (Order) issued to the Crossroads of the West Council (Council), Boy Scouts of America, on August 4, 2020. The purpose of this letter is to approve the Council's schedule (Schedule) of corrective actions to prevent future *E. coli* contamination at the System. The Schedule was submitted to the EPA in a September 14, 2020, letter from Weston Groundwater Engineering, and was revised following receipt of the October 22, 2020, lab report with Microscopic Particulate Analysis (MPA) results. The Schedule is hereby incorporated into the Order pursuant to paragraph 15. Each milestone and deadline specified below is an enforceable provision of the Order. The EPA's approval of the Council's Schedule does not substitute for any other approval that may be required by any other governmental entity for modifying the System. The EPA encourages Council to contact any such governmental agency or agencies regarding any applicable approval requirements.

Milestone

Deadline Date

Submit plan and schedule to EPA	September 14, 2020 (Completed)
Collect MPA sample from Explorer Well #1.	September 16, 2020 (Completed)
Drain and close water system for the winter.	September 25, 2020 (Completed)
Submit MPA results to the EPA for review.	October 22, 2020 (Completed)

Install wellhead disinfection unit. Submit documentation of installation to the EPA, to include photos if possible.	May 26, 2021
Perform calibration and chlorine residual testing.	May 28, 2021
Begin collection of daily samples following disinfection. Analyze each sample for total coliform and <i>E. coli</i> and email results to the EPA. The EPA will provide written notification when sampling may be discontinued, and Boil Water Advisory lifted.	June 2, 2021
Maintain safe water without <i>E. coli</i> contamination.	June 7, 2021

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 EPA is authorized to seek penalties if these deadlines are not met. If the Council has a reasonable basis to believe it may be unable to meet any deadline in the Schedule, it shall notify the EPA well in advance of the Scheduled deadline to request an extension. The EPA may, in its discretion, consider granting an extension.

In addition, the EPA acknowledges that the COVID-19 pandemic also may impact construction projects. If the Council has specific COVID-19 issues that would affect the timeframes listed herein, please contact Jill Minter via email at [minter.jill@epa.gov](mailto:minter.jill@epa.gov) or by phone at (800) 227-8917, extension 6084, or (303) 312-6084 as soon as possible. We will consider nationwide public health developments and your specific circumstances in determining an appropriate timeline while still pursuing compliance with the Safe Drinking Water Act as expeditiously as possible.

If you have any questions concerning this Addendum, please contact Jill Minter at the email and phone number listed in the above paragraph. Any legal questions from the Council's 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,



for

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

cc: WY DEQ/DOH (via email)  
Teton County Commissioners ([mnewcomb@tetonwyo.org](mailto:mnewcomb@tetonwyo.org))  
Arne Carter, Emergency Contact, Teton High Adventure Base ([arnecarter@gmail.com](mailto:arnecarter@gmail.com))  
Ben J. Jordan, P.G., Weston Groundwater Engineering ([bjordan@westonengineering.com](mailto:bjordan@westonengineering.com))  
Melissa Haniewicz, EPA Regional Hearing Clerk