



REGION 3

PHILADELPHIA, PA 19103

FILED
Nov 13, 2025
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U.S. EPA REGION 3
HEARING CLERK

In the Matter of:

Allegheny East Conference of
Seventh Day Adventists
767 Douglass Drive
Boyertown, Pennsylvania 19512

Respondent.

PWS ID No. PA3060984

System.

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: **U.S. EPA Docket No. SDWA-03-2026-0069DS**
:
: **Proceeding under Section 1414(g) of the**
: **Safe Drinking Water Act,**
: **42 U.S.C. Section 300g-3(g)**
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I. STATUTORY AUTHORITY

The following FINDINGS are made and ORDER (“ORDER”) 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 (“SDWA”), 42 U.S.C. Section 300g-3(g) (“the Act”), and duly delegated to the Director of the Enforcement and Compliance Assurance Division of Region 3.

II. FINDINGS

1. Allegheny East Conference of Seventh Day Adventists (hereinafter “Respondent”) owns and/or operates the Allegheny East Conference of Seventh Day Adventists “public water system” (the “PWS” or “System”) located at 767 Douglass Drive, Boyertown, PA 19512. A “public water system” 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).
2. Respondent is a “supplier of water” within the meaning of Section 1401(5) of the SDWA,

42 U.S.C. §300f(5) and 40 C.F.R. §141.2.

3. Respondent is a “person” within the meaning of Section 1401(12) of the SDWA, 42 U.S.C. §300f(12), and is subject to an Administrative Order (“AO”) issued under Section 1414(g)(1) of the SDWA, 42 U.S.C. §300g-3(g)(1).
4. Non-Transient Non-Community Water System. The System regularly serves a population of at least 25 individuals for at least 6 months per year, and is therefore a “non-transient non-community water system” as defined by Section 1401(16) of the SDWA, 42 U.S.C. §300f(16), and 40 C.F.R. §141.2. Respondent is, therefore, subject to the requirements of Part B of the SDWA, 42 U.S.C. §300g et seq., and its implementing regulations found at 40 C.F.R. Part 141.

Lead and Copper Rules

5. In 1991, EPA published the Lead and Copper Rule (“LCR”), 40 C.F.R. Part 141 Subpart I, to minimize lead and copper in drinking water. The LCR established action levels of 0.015 mg/L for lead and 1.3 mg/L for copper; a maximum contaminant level goal (“MCLG”) of 0 mg/L for lead and 1.3 mg/L for copper; and includes requirements to monitor at the tap, optimize corrosion control (and if appropriate, treat source water), deliver public education, and replace lead service lines. Pursuant to 40 C.F.R. §141.80(a), the LCR is applicable to community water systems and non-transient non-community water systems.
6. Since 1991, the LCR has undergone various revisions. In 2000, EPA published revisions to the LCR, known as LCR Minor Revisions, to address implementation issues and streamline and reduce the monitoring and reporting burden. In 2004, EPA published minor corrections to the LCR to reinstate text that was inadvertently dropped from the rule in previous revisions. In 2007, EPA promulgated the LCR Short-Term Revisions to enhance implementation in the areas of monitoring, treatment, customer awareness, and lead service line replacement.
7. On January 15, 2021, EPA promulgated the Lead and Copper Rule Revisions (“LCRR”). Then, on December 6, 2023, EPA published the proposed Lead and Copper Rule Improvements (“LCRI”) which was finalized on October 8, 2024. The LCRI requirements will supersede the LCRR in November 2027. The LCRI modifies most of the requirements in the LCRR and establishes a compliance date of November 1, 2027, for those provisions. The LCRI also incorporates select provisions from the 2021 LCRR¹, including the public notification requirements for Tier 1 public notices of lead action level exceedances.

¹ Pursuant to 40 C.F.R. 141.80(a)(4), between October 30, 2024, and November 1, 2027, community water systems and non-transient non-community water systems must comply with [40 CFR 141.2](#), [141.31\(d\)](#), and [141.80](#) through [141.91](#), as codified on July 1, 2020, except systems must also comply with [40 CFR 141.84\(a\)\(1\)](#) through [\(10\)](#) (excluding paragraphs (a)(6) and (7)), [141.85\(a\)\(1\)\(ii\)](#) and (e), [141.90\(e\)\(1\)](#) and (13), (f)(4), and (h)(3), 141.201(a)(3)(vi) and (c)(3), and 141.202(a)(10); [40 CFR Part 141, Appendix A](#) to Subpart Q, entry I.C.1 (excluding § 141.90, except paragraphs (e)(1) and (13) and (f)(4)) and entry I.C.2; [40 CFR Part 141, Appendix B](#) to Subpart Q, entry D.23; and [40 CFR 141.31\(d\)\(2\)](#), as codified on July 1, 2024.

8. Until a State, Tribe, or Territory has primary enforcement authority for a new or revised National Primary Drinking Water Regulation (“NPDWR”), such as the LCRR and LCRI, Section 1413 of the SDWA, 42 U.S.C. § 300g-2, states that only EPA can enforce the NPDWR pursuant to Section 1414 of the SDWA, 42 U.S.C. § 300g-3(a). In addition, when the State does not have primacy for a new or revised rule, EPA Regional Administrator is the primacy agency for purposes of implementation of the NPDWR pursuant to 40 C.F.R. § 141.2.
9. The Pennsylvania Department of the Environmental Protection (“PADEP”) administers the Public Water System Supervision Program in Pennsylvania pursuant to Section 1413 of the SDWA, 42 U.S.C. § 300g-2. On January 3, 1985, EPA approved Pennsylvania’s application for primary enforcement responsibility (“primacy”) under the SDWA, effective February 4, 1985. On August 6, 2003, EPA approved Pennsylvania’s revisions to its approved State Public Water System Supervision Primacy Program including regulations for lead and copper, effective September 5, 2003. PADEP administers the “Approved State primacy program,” as that term is defined in 40 C.F.R. §142.2. However, as of the date of this Order, PADEP has not obtained primacy for the LCRR or LCRI.
10. If a water system exceeds the lead action level as specified in 40 C.F.R. § 141.80(c), then 40 C.F.R. § 141.201(a)(3)(vi) requires that Tier 1 Public Notification (“PN”), in accordance with 40 C.F.R. Subpart Q of Part 141, be provided to persons served by the water system no later than 24 hours after the system learns of the action level exceedance.
11. EPA provided notification to an appropriate local elected official prior to the issuance of this Order, in accordance with Section 1414(a)(2)(B) of SDWA, 42 U.S.C. § 300g-3(a)(2)(B).

Findings of Violation

12. The System is a non-transient non-community water system and is, therefore, subject to the requirements of 40 C.F.R. Part 141 Subpart I.
13. Based on information available to EPA, the System’s 90th percentile for lead for the June 1, 2025 to September 30, 2025 monitoring period was 18.95 micrograms per liter (“µg/L”), exceeding the lead action level of 15 µg/L. The System learned of the exceedance on October 14, 2025.
14. Based on information available to EPA, the System failed to provide Tier 1 PN within 24 hours of having learned of the exceedance as required under 40 C.F.R. §141.202.
15. EPA is issuing this Order to address the violation(s) enumerated above and establish an enforceable schedule to bring Respondent into compliance with the SDWA and the LCRR and LCRI.

III. ORDER

Based on the foregoing FINDINGS, and pursuant to the authority of Section 1414(g) of the SDWA, EPA hereby ORDERS Respondent to do the following:

16. Within 24 hours of the Effective Date of this Order, Respondent shall issue a Tier 1 Public Notice for its lead action level exceedance, as required by 40 C.F.R. § 141.202.
17. Respondent shall provide a copy of the Public Notice within 24 hours of issuance to the following:

Natale DePase
Safe Drinking Water Act and Wetlands Section
Enforcement and Compliance Assurance Division
US Environmental Protection Agency, Region 3
depase.natale@epa.gov
(215) 814-2799

and

Joseph M. Mattucci
Program Manager
Safe Drinking Water Program
Southcentral Regional Office
Pennsylvania Department of Environmental Protection
jomattucci@pa.gov
717-705-4931

IV. GENERAL PROVISIONS

18. All notices, reports, or other submissions by Respondent shall be accompanied by the following certification:

“I certify, under penalty of law, that the information contained in or accompanying this submission is true, accurate and complete based upon representations as to accuracy and completeness made to me either orally or through submission of documentation by appropriate personnel with responsibility for the matters contained herein. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations in accordance with 18 U.S.C. § 1001.”

19. Notwithstanding Respondent’s compliance with any requirement of this Order, Respondent’s failure to comply with all the requirements of the SDWA and 40 C.F.R. Part 141

may subject Respondent to additional enforcement action, including but not limited to judicial, administrative, and equitable actions.

20. This Administrative Order shall not prohibit, prevent, or otherwise preclude EPA from taking whatever action it deems appropriate to enforce the SDWA in any manner and shall not prohibit, prevent, or otherwise preclude EPA from using this Order in subsequent administrative or judicial proceedings. Nothing in this Order shall constitute a waiver, suspension or modification of the requirements of the SDWA, or the rules and regulations promulgated thereunder which remain in full force and effect. Issuance of this Order is not an election by EPA to forgo any civil or criminal action otherwise authorized under the Law.
21. Respondent may seek federal judicial review of the Order pursuant to Section 1448(a) of the SDWA, 42 U.S.C. §300j-7(a).
22. This Order does not relieve Respondent of any responsibilities or liabilities established pursuant to any applicable federal, state, or local law.

V. TERMINATION

23. The obligations of this Order shall terminate when EPA determines that the Respondent has fully complied with the Order's terms and conditions, and EPA provides written notice of its determination to Respondent.
24. The 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 the Respondent has adequately complied with all requirements of this Order, EPA shall provide written notification of termination of this Order, as described in the previous paragraph.

VI. EFFECTIVE DATE

25. This Order shall become effective upon Respondent's receipt of this Order ("Effective Date").

In the Matter of Allegheny East Conference of
Seventh Day Adventists

U.S. EPA Docket No. SDWA-03-2026-0069DS

IT IS SO ORDERED:

Andrea Bain
Acting Director
Enforcement and Compliance Assurance Division

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Philadelphia, Pennsylvania 19103**

In the Matter of: :
 :
 Allegheny East Conference of : **U.S. EPA Docket No. SDWA-03-2026-0069**
 Seventh Day Adventists :
 767 Douglass Drive : **Proceeding under Section 1414(g) of the**
 Boyertown, PA 19512 : **Safe Drinking Water Act,**
 : **42 U.S.C. Section 300g-3(g)**

Respondent.

PWS ID No. PA3060984

System.

CERTIFICATE OF SERVICE

I certify that the foregoing **Order** was filed with EPA Region 3 Regional Hearing Clerk on the date that has been electronically stamped on the **Order**. I further certify that on the date set forth below, I caused to be served a true and correct copy of the foregoing to each of the following persons, in the manner specified below, at the following addresses:

Copies served via email to:

Lawrance Martin
Allegheny East Conference of Seventh Day Adventists
lmartin@aecsda.com
767 Douglass Drive
Boyertown, PA 19512

Natale DePase
U.S. EPA, Region 3
Depase.Natale@epa.gov

By: _____
[Digital Signature and Date]
Regional Hearing Clerk
U.S. EPA – Region 3