

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

Received by  
EPA Region VIII  
Hearing Clerk

IN THE MATTER OF	)	
	)	Docket No. SDWA-08-2022-0011
City of Rawlins,	)	
	)	<b>EMERGENCY</b>
Respondent.	)	<b>ADMINISTRATIVE ORDER</b>
	)	
City of Rawlins Water Supply Public	)	
Water System PWS ID #WY5600045	)	

**AUTHORITY**

1. This Emergency Administrative Order (Order) is issued by the U.S. Environmental Protection Agency (EPA) pursuant to the authority of section 1431(a) of the Safe Drinking Water Act (Act), 42 U.S.C. § 300i(a). The undersigned official has been properly delegated this authority.
2. The EPA may issue an order under section 1431(a) of the Act, 42 U.S.C. § 300i(a), when a contaminant that is present in or is likely to enter a public water system may present an imminent and substantial endangerment to the health of persons, and appropriate state and local authorities have not acted to protect the health of such persons.

**FINDINGS**

3. The City of Rawlins (City), Wyoming (Respondent) is a municipality that owns and operates the City of Rawlins Water Supply Public Water System (System), which provides piped water to the public in Carbon County, Wyoming, for human consumption.
4. Respondent is a “person” as that term is defined in the Act. 42 U.S.C. § 300f(12).
5. The System is supplied by a surfacewater source accessed via 30 springs, 3 wells, several surface water collection reservoirs, and the North Platte River. All source water is treated in the surface water treatment plant. Source waters from Rawlins Reservoir, the springs and the wells are piped through Sage Creek Pipeline either directly to the treatment plant or to a terminal reservoir at the water treatment plant site, known as the Peaking Reservoir. North Platte River water is pumped and stored in the raw water (Thayer) tank, then pumped to the Atlantic Rim Reservoir. From the Atlantic Rim Reservoir, water can flow directly to the Sage Creek pipeline or the Peaking Reservoir. Water from the various sources flows by gravity to the water treatment plant. Water treatment consists of precoat filtration (using perlite as the precoat and body feed media) and gaseous chlorine disinfection.
6. The System has 3,860 service connections and regularly serves 9,749 individuals year-round.

7. The System is a “public water system” as defined in 40 C.F.R. § 141.2 and section 1401(4) of the Act, 42 U.S.C. § 300f(4), and, therefore, is subject to the requirements of the Act and the National Primary Drinking Water Regulations at 40 C.F.R. part 141 (Part 141).

8. Prior to issuing this Order, the EPA consulted with the System to confirm the facts stated in this Order and with state and local authorities to ascertain they have not acted to protect the health of persons in this instance.

9. The EPA has determined that conditions exist at the System that may present an imminent and substantial endangerment to the health of humans, based on the facts indicated in paragraph 10, below. The EPA has determined that this Order is necessary to protect public health.

10. On March 3, 2022, the EPA was notified by a customer and the Wyoming Consumer Health Division that the System lost pressure. The System lost pressure due to three concurrent problems: reduced water flow into the City from the springs, water main breaks that occurred in the City that resulted in the tank reserves being drained, and a pump issue at the water treatment plant.

11. Loss of pressure in a drinking water distribution system may cause a net movement of water from outside of a pipe to the inside through cracks, breaks, or joints in the distribution system that are common in all water systems. Backsiphonage is also a condition resulting from low or no pressure. Such system failures carry a high potential for fecal contamination or other disease-causing organisms to enter a distribution system.

12. On March 3, 2022, the EPA provided Respondent with a public notice template for a boil water advisory, and Respondent notified persons served by the System of the contamination on March 3, 2022.

### **ORDER**

#### **INTENT TO COMPLY**

13. Within 24 hours of receipt of this Order, Respondent shall notify the EPA in writing of their intent to comply with this Order. Notification by e-mail to the EPA point of contact identified below is acceptable.

### **BOIL WATER ADVISORY AND PUBLIC NOTICE**

14. The boil water advisory referenced in paragraph 12, above, shall remain in place until the EPA provides written notification to Respondent that the boil water advisory is no longer needed.

15. Respondent must carry out the public notice and other notice requirements as required by 40 C.F.R. part 141, subpart Q.

### **ALTERNATE WATER SUPPLY**

16. Using the public notice referenced in paragraph 12, above, Respondent shall, no later than 24 hours after receipt of this Order, notify the public that an alternative potable water supply is available at no cost to all users of the System as needed for drinking, cooking, maintaining oral hygiene, and dish washing. Respondent shall provide at least two liters of potable water daily per person at a central location that is accessible to all persons served by the System. The alternate water supply shall be made available until the Respondent receives written notification from the EPA that it is no longer necessary to supply alternative potable water.

17. No later than five days after the effective date of this Order (see paragraph 32, below), Respondent shall provide the EPA with a copy of its notification to the public indicating that an alternate water supply is available.

### **CORRECTIVE MEASURES**

18. Within 15 days after the effective date of this Order, Respondent shall provide the EPA with a plan and schedule that outlines corrective actions taken and/or to be taken to prevent future contamination at the System. The plan shall identify the cause of the contamination referenced in paragraph 10 and include proposed system modifications, estimated costs of modifications, and a schedule for completion of the project. The proposed schedule shall include specific milestone dates and a final completion date (to be within three months from the date of the EPA's approval of a schedule). The schedule must be approved by the EPA before construction or modifications may commence.

19. The schedule required by paragraph 18, above, will be incorporated into this Order as an enforceable requirement upon written approval by the EPA. If implementation of the plan fails to correct and/or prevent further contamination, the EPA may order further steps.

20. Respondent shall notify the EPA in writing within 24 hours after completing corrective action.

### **DISTRIBUTION SYSTEM DISINFECTION AND MONITORING REQUIREMENTS**

21. Within 24 hours after corrective action has been taken to address the cause of the pressure loss required by paragraph 18, above, Respondents shall disinfect and flush the System.
22. Following disinfecting and flushing of the System, Respondents shall monitor the chlorine residual in the distribution system on a daily basis. Beginning on the first date when chlorine levels return to normal, Respondents shall collect daily (two samples per day, one sample from a location in the distribution system upstream of the pressure loss, and one sample from a location in the distribution system downstream of the pressure loss) special purpose samples (defined in 40 C.F.R. § 141.853(b)) from the System's distribution system until notified by the EPA that daily sampling may be discontinued. These daily samples should be labeled as "special" samples, not for use for compliance. Respondents shall ensure that each sample is analyzed for total coliform and *E. coli* and shall email each result to the EPA upon receipt of the analysis from the laboratory. Along with the total coliform sample collection, Respondents shall measure the chlorine residual indicating free or total, and provide these measurements along with the total coliform analysis from the laboratory.
23. After Respondent receives written notification from the EPA that it may discontinue "special" daily total coliform sampling, Respondent shall thereafter resume monthly routine total coliform sampling as required by 40 C.F.R. § 141.855.
24. The EPA may require Respondent to increase sampling at any time while this Order is in effect.

### **REPORTING**

25. Respondent must give daily updates to the EPA on the progress of repairing the main line breaks, reduced water flow, water treatment plant pump issues, disinfecting and flushing the System, and monitoring for total coliform and chlorine residual. Updates must be submitted to the EPA daily until the EPA provides written notification to the Respondent that reports may be submitted less frequently or discontinued. These reports may be submitted via e-mail.
26. Any notices, reports, or updates required by this Order to be submitted to the EPA shall be submitted to:

Steven Latino  
via e-mail: [latino.steven@epa.gov](mailto:latino.steven@epa.gov)  
Telephone (800) 227-8917, ext. 6440, or (303) 312-6440

27. This Order does not relieve Respondent from the obligation to comply with any applicable federal, or local law.

Emergency Administrative Order  
City of Rawlins Water Supply Public Water System  
Page 5 of 5

28. Failure to comply with this Order may result in civil penalties of up to \$26,209 per day. 42 U.S.C. § 300i(b); 40 C.F.R. part 19; 87 Fed. Reg. at 1679 (January 12, 2022).
29. This Order constitutes final agency action. Respondent may seek federal judicial review of this Order pursuant to section 1448(a) of the Act, 42 U.S.C. 300j-7(a).
30. The EPA may modify this Order. The EPA will communicate any modification(s) to Respondent in writing and they shall be incorporated into this Order.
31. The provisions of this Order shall be deemed satisfied upon Respondent's receipt of written notice from the EPA that Respondent has demonstrated, to the satisfaction of EPA, that the terms of this Order have been satisfactorily completed.
32. Issued and effective this 4th day of March, 2022.

---

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