



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, DC, 20460

September 15, 2021

11:17 AM

Received by
EPA Region VIII
Hearing Clerk

Ref: 8ENF-W-SD

September 14, 2021

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
and via email

Mr. Amandeep Pandher , Respondents
Akal Travel Center
168 Hunt Road,
Laramie WY 82070
mp@akalenergy.com; akalenergy@energy.com

Re: Violation of Mr. Amandeep Pandher Administrative Order,
Docket No. SDWA-08-2020-0046, Akal Travel Center Public Water System, PWS ID
WY5600313

Dear Mr. Amandeep Pandher:

The purpose of this letter is to notify you that civil penalties and/or a federal court injunction may be ordered against you for violating the Safe Drinking Water Act at the Akal Travel Center Public Water System. Specifically, on September 03, 2020, the EPA issued the above-referenced Administrative Order (Order), directing you to comply with the National Primary Drinking Water Regulations 40 C.F.R. part 141 (Part 141) issued by the EPA under the Safe Drinking Water Act, 42 U.S.C. section 300f, *et seq* (Act). Our records indicate that you are in violation of the Order.

Among other things, the Order included the following requirements (summarized from paragraph 16, on pages 3 of the Order and referring to you as the Respondents), which have not been completed:

- **Not completed (significant deficiencies of Well #1 and Well #3 have not been corrected):**
Within 30 calendar days of receipt of this Order, Respondents shall consult with the EPA regarding actions to correct significant deficiencies and shall submit a proposed schedule (Schedule) and plan to the EPA for completion of all corrective actions. The Schedule shall be approved by the EPA and 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, Respondents shall notify the EPA of the project's completion. Respondents shall provide sufficient evidence to the EPA including photographs of the corrective actions. Thereafter, if the EPA identifies any significant deficiency (SD) at the System, Respondents shall complete corrective action for each SD and provide notification to the EPA within 30 calendar days of completion, as required by 40 C.F.R. §§ 141.403(a) and 141.405(a)(2).

Corrective Actions:

- SD#2: All openings in Well WL01 - Well #1 (Stuckey's #3) must be sealed and watertight. Well #1 must be adequately protected to prevent damage due to vehicle operations.
- SD#3: Well WL01 - Well #1 (Stuckey's #3) must be fitted with a functioning sanitary seal that is tightly bolted and does not allow contamination to enter the well.
- SD#4: The permanent casing for Well WL03 - Well #3 (Fleischli Well #1) must project at least 12 inches above the concrete floor or apron and at least 18 inches above normal ground surface.
- SD#5: Well WL03 - Well #3 (Fleischli #1) must be fitted with a functioning sanitary seal that is tightly bolted and does not allow contamination to enter the well.
- SD#6: The height of the well vent for Well WL03 - Well #3 (Fleischli #1) must be at least as high as the well casing for the pitless unit.
- SD#7: The well vent for Well WL03 - Well #3 (Fleischli #1) must be fitted with a #24-mesh corrosion-resistant screen.

Violation of any part of this Order, the Act, or 40 C.F.R. Part 141 may subject Respondents to a civil penalty of up to \$59,017 (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; 85 Fed. Reg. at 83821 (December 23, 2020).

In addition, the EPA acknowledges that the COVID-19 pandemic may be impacting Akal Travel Center Public Water System. If the Akal Travel Center has specific COVID-19 issues that would affect the timeframes listed herein, please contact Jacob Lunn via email at lunn.jacob@epa.gov or by phone at 202-564-2141 within seven days of receiving this letter regarding your administrative order noncompliance. We will consider nationwide public health developments and your specific circumstances in determining an appropriate timeline for responding to this matter, while still pursuing regulatory compliance with the Safe Drinking Water Act as expeditiously as possible.

For assistance with actions necessary to come into compliance, please contact Jacob Lunn via email at lunn.jacob@epa.gov, or by phone at 202-564-2141. Any questions from your attorney should be directed to Mia Bearley, Attorney, via email at bearley.mia@epa.gov or by phone at, or (303) 312-6554.

We urge your prompt attention to this matter.

Carol King, Acting Branch Chief
Water Enforcement Branch
Office of Civil Enforcement

Enclosures

cc: WY DEQ/DOH (via email)
Albany County Commissioners (tchesnut@co.albany.wy.us)
Melissa Haniewicz, EPA Regional Hearing Clerk