



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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<http://www.epa.gov/region08>

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EPA REGION VIII
HEARING CLERK

SEP 12 2017

Ref: 8ENF-W-SDW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Weldon Treat, Registered Agent
The Rocky Mountain Conference of Seventh-Day Adventists
P.O. Box 51915
Casper, Wyoming 82601

Re: Administrative Order Violation, Mills Spring Ranch Public Water System,
PWS ID #5600631, Docket # SDWA-08-2016-0031

Dear Mr. Treat:

On September 29, 2016, the U.S. Environmental Protection Agency issued an Administrative Order (Order) ordering The Rocky Mountain Conference of Seventh-Day Adventists (RMC), as owner and/or operator of the Mills Spring Ranch Public Water System (System), to comply with the Safe Drinking Water Act, 42 U.S.C. Section 300f et seq., and its implementing regulations, the National Primary Drinking Water Regulations, 40 C.F.R. part 141.

Our records indicate that the RMC is in violation of the Order. Among other things, the Order included the following summarized requirements (from paragraphs 15, 17, 18, and 19 of the Order) in which the RMC is named as Respondent:

- Respondent shall monitor the System's water monthly for total coliform bacteria when it is open to the public as required by 40 C.F.R. § 141.853-858. Respondent shall report any violation of coliform monitoring requirements to the EPA within 10 days after discovering the violation, as required by 40 C.F.R. § 141.861(a)(4).

The EPA has not received monthly total coliform analytical results for July 2017 and the RMC did not report the violation to the EPA. If you have the monitoring results, send them to the EPA immediately.

- Within 30 days after opening for the 2017 season, and as required by the Drinking Water Regulations thereafter, Respondent shall monitor both of the System's water sources for nitrate as required by 40 C.F.R. § 141.23(d).

The EPA has only received **nitrate** results from the Wishing Well source taken on June 23, 2017. If you have nitrate monitoring results for the Spring source, send it to the EPA immediately. If you have not yet monitored the Spring source for nitrate, monitor immediately and send the results to the EPA.

- Between June 1-30, 2017, and again during the 3rd quarter of 2017, and thereafter as notified in writing by the EPA of a different monitoring schedule, Respondent shall monitor both of the System's water sources for nitrite and have the samples analyzed separately from nitrate. If results exceed the nitrite MCL of 1 mg/L (rounded), Respondent shall take a confirmation sample within 24 hours of notification of the nitrite analytical results, as required by 40 C.F.R. § 141.23(e).

The EPA has only received **nitrite** results from the Wishing Well source taken on June 23, 2017. If you have nitrite monitoring results for the Spring source, send it to the EPA immediately. If you have not yet monitored the Spring source for nitrite, monitor immediately and send the results to the EPA.

- Within 30 days after opening for the 2017 season, Respondent shall notify the public of all violations cited in paragraphs 9 through 11 [in the Order]. Thereafter, following any future violation of the Drinking Water Regulations, Respondent shall comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 days after providing public notice, Respondent shall submit a signed copy of the notice to the EPA that states the dates the notice was completed. Instructions and templates can be found at: <https://www.epa.gov/region8-waterops/public-notification-drinking-water-contaminant-failure-monitor-ftm-template>.

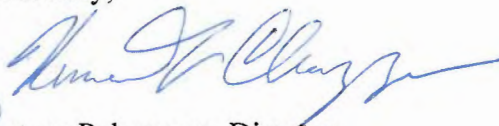
The EPA has not received a completed public notice. Send a completed, signed copy to the EPA if one has been completed or complete the public notice immediately if not yet done and send a signed copy to the EPA.

The EPA is considering additional enforcement action as a result of RMC's non-compliance with the Order. Violating an administrative order may lead to (1) a penalty of up to \$54,789 per day per violation of the Order, and/or (2) a court injunction ordering compliance.

If you have any questions please contact Kathelene Brainich via email at brainich.kathelene@epa.gov, or by phone at 1-800-227-8917, extension 6481, or (303) 312-6481. If you are represented by an attorney who has questions, please ask the attorney to direct legal questions to Mia Bearley, Enforcement Attorney, who may be reached via email at bearley.mia@epa.gov, by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

We urge your prompt attention to this matter.

Sincerely,


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

cc: Ed Barnett, President, RMC 7th Day Adventists (edb@rmcsda.org)
Matt Moreland, Mills Spring Ranch (mattm@rmcsda.org)
WY DEQ/DOH (via email)
Melissa Haniewicz, EPA Regional Hearing Clerk