



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

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SEP 12 2017

Ref: 8ENF-W-SDW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Alm, Registered Agent
Paint Rock Canyon Enterprises, LLC
1 Hyatt Lane
Hyattville, Wyoming 82428-0010

Joseph Collins, Registered Agent
C5 Youth Foundation of Southern California, Inc.
3100 North Broadway
Los Angeles, California 90031

Re: Administrative Order Violation, Camp Paintrock Public Water System,
PWS ID #5601513, Docket Nos. SDWA-08-2015-0050, SDWA-08-2017-0008

Dear Messrs. Alm and Collins:

On September 28, 2015, and March 10, 2017, the EPA issued Administrative Orders (Orders) to Paint Rock Canyon Enterprises, LLC and C5 Youth Foundation of Southern California, Inc. (Respondents), as owners and/or operators of the Camp Paintrock Public Water System, ordering compliance with the Safe Drinking Water Act (SDWA), 42 U.S.C. Section 300f et seq., and its implementing regulations, the National Primary Drinking Water Regulations (NPDWRs), 40 C.F.R. part 141.

Our records indicate that Respondents are in violation of the Orders.

Among other things, the September 28, 2015, Order included the following requirements (from paragraph 14 on page 3 of the Order):

1. Beginning April 1, 2016, the effective date of the EPA Revised Total Coliform Rule, Respondents shall monitor the System's water **monthly** for total coliform bacteria and, if any sample is positive for total coliform, conduct repeat monitoring as required by 40 C.F.R. §141.853-857. Respondents shall report analytical results to the EPA within the first 10 days following the month in which Respondents receive sample results, as required by 40 C.F.R. § 141.31(a). Respondents shall report any violation of coliform monitoring requirements in 40 C.F.R. subpart Y 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 June and July 2017 and you did not report the violations to the EPA. If you have the monitoring results, send them to the EPA

immediately. The EPA has received the three total coliform positive *repeat* sample results from July 2017. This lack of monitoring is particularly troubling for the following reasons: (1) the System had multiple special total coliform positive sample results during the June 2017 seasonal startup procedures; (2) you were previously notified by letter dated November 6, 2016, that you failed to monitor total coliform in July and August 2016 in violation of the Order; and (3) the System has had total coliform failure to monitor violations every year for the past four years (2014-2017).

Among other things, the March 10, 2017, Order included the following requirements (from paragraph 9 on page 2 of the Order):

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


The EPA has not received nitrate monitoring results for July 2017. If you have results, forward them to the EPA immediately. If you have not yet monitored for nitrate, monitor immediately and send the results to the EPA.

The EPA is considering additional enforcement action as a result of the continued non-compliance with the Orders. Violating an administrative order may lead to (1) a penalty of up to \$53,907 per day per violation of the Order, and/or (2) a court injunction ordering compliance.

If you have any questions you may 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 Lauren Hammond, Enforcement Attorney, who may be reached via email at hammond.lauren@epa.gov, by phone at (800) 227-8917, extension 7081, or (303) 312-7081, or at the above address (with the mailcode 8ENF-L).

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: WY DEQ/DOH (via email)
Melissa Haniewicz, EPA Regional Hearing Clerk