



January 15, 2025

Ref: 8ECA-W-S

SENT VIA EMAIL  
DIGITAL DELIVERY RECEIPT REQUESTED

Mr. Jason Murphy, Facilities Manager  
Yellowstone National Park- Old Faithful Public Water System  
[Jason\\_Murphy@nps.gov](mailto:Jason_Murphy@nps.gov)

Subj: Administrative Order Addendum, U.S. Department of the Interior, National Park  
Service regarding YNP- Old Faithful Public Water System, PWS ID #WY5680085,  
Docket No. SDWA-08-2024-0049

Dear Mr. Murphy:

This is an Addendum to the Administrative Order (Order) issued to the National Park Service regarding YNP -Old Faithful Public Water System on September 30, 2024. The purpose of this letter is to approve the Respondent's October 23, 2024, schedule (Schedule) for coming into consistent compliance with the arsenic contaminant level (MCL). The Schedule is hereby incorporated into the Order pursuant to paragraph 13 of the Order. Each milestone and deadline specified below is an enforceable provision of the Order.

<u>Milestone</u>	<u>Deadline</u>	<u>Projected Cost</u>
NPS Funded Design and Construction of New Old Faithful WTP	March 2021	\$17,000,000
Initial Contact with WY DEQ regional engineer	Spring 2021	
Jacobs Engineering DD & CD stamped final	March 2023	
Contact engineer regarding treatment options	Spring 2021-present	

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<u>Milestone</u>	<u>Deadline</u>	<u>Projected Cost</u>
Receive permit to construct from WY DEQ	June 6, 2024	
Submit plan and schedule to EPA case manager	October 2024	
Receive bids from solicitation for project	December 2024	
Award bid for construction contract	Winter 2024-2025	
Project start (snowpack dependent)	May 2025	
Clean Filters and Filter Media at current water plant	Winter 2025	
Project completion	Summer 2027	
Notify the EPA of construction completion. Complete PWS Inventory Change Form and submit to the EPA: <a href="https://www.epa.gov/region8-waterops/epa-r8-public-water-system-inventory-change-form">https://www.epa.gov/region8-waterops/epa-r8-public-water-system-inventory-change-form</a> .	Summer 2027 (no later than August 31)	
Pilot Testing	August 2027- October 2027	
Post construction sampling	November 2027- November 2028	
Send EPA case manager quarterly enforcement report	By the 10 <sup>th</sup> day of the month following each calendar quarter.	

Within 10 calendar days of completing all steps included in the above Schedule, please notify the EPA of the project's completion as required by the Order. The Order also requires Respondent to achieve and maintain compliance with the arsenic MCL by the final date specified in the approved Schedule. The EPA is authorized to seek penalties if these deadlines are not met. If Respondent has a reasonable basis to believe it may be unable to meet any deadline in the Schedule, it must notify the EPA well in advance of the Scheduled deadline to request an extension. The EPA may, in its discretion, consider granting an extension.

The Surface Water Treatment Rule Significant Deficiencies were returned to compliance by the EPA Region 8 Water Division on October 21, 2024.

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If you have any questions or to request an informal conference with the EPA, please contact Jessica Moore via email at [moore.jessica@epa.gov](mailto:moore.jessica@epa.gov), or by phone at (800) 227-8917, extension 6441, or (303) 312-6441. Any questions from the National Park Service's attorney should be directed to Noah Stanton, Associate Regional Counsel, at [stanton.noah@epa.gov](mailto:stanton.noah@epa.gov) or by phone at (800) 227-8917, extension 6163, or (303) 312-6163.

Sincerely,

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

cc:

WY DEQ/DOH (via email)  
Teton County Commissioners  
EPA Regional Hearing Clerk Duane Bubac, Yellowstone National Park, Chief of  
Facilities Management and  
Operations  
Daniel Hallett, Yellowstone National Park, Deputy Chief of Facilities Management  
and Operations  
Daniel Adams, Yellowstone National Park, Water Treatment Operator  
Sean Rauch, Yellowstone National Park, Old Faithful Area Supervisor of Facilities  
Management  
Christopher Gall, Yellowstone National Park, Utilities System Operator  
Molly Ohlen, Yellowstone National Park, Civil Engineer  
Bradley Ellis, WY DEQ District Engineer  
Lily Barkau, WY DEQ, Natural Resources Program Manager