

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

FILED

Sep 29, 2025

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**U.S. EPA REGION 8
HEARING CLERK**

IN THE MATTER OF:)

Aladdin Water District)

Respondent.)

Aladdin Water District Public Water System)

PWS ID # WY5601489)

Docket No. SDWA-08-2025-0047

ADMINISTRATIVE ORDER

1. This Order is issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by section 1414(g) of the Safe Drinking Water Act (Act), 42 U.S.C. § 300g-3(g), as properly delegated to the undersigned official.
2. The Aladdin Water District (Respondent) is a public body created by or pursuant to Wyoming law that owns and/or operates the Aladdin Water District Public Water System (System), which provides piped water to the public in Crook County, Wyoming, for human consumption.
3. The System is supplied by a groundwater source accessed via one well. The water is treated with sodium hypochlorite and then stored in two 2,500-gallon storage tanks.
4. The System has approximately eight service connections and/or regularly serves an average of approximately 62 individuals daily at least 60 calendar days out of the year. Therefore, the System is a “public water system” as defined in section 1401(4) of the Act, 42 U.S.C. § 300f(4), and 40 C.F.R. § 141.2. Further, the System is a non-community water system that does not regularly serve at least 25 of the same persons over six months per year and, as such, is also a “transient non-community water system” as defined in 40 C.F.R. § 141.2.
5. Respondent is a “person” as defined in section 1401(12) of the Act, 42 U.S.C. § 300f(12) and is subject to the Act and 40 C.F.R. part 141 (Part 141). Part 141 is an “applicable requirement” as defined in section 1414(i) of the Act, 42 U.S.C. § 300g-3(i).
6. Part 141 includes monitoring requirements. The EPA has sent Respondent annual notifications of the specific monitoring requirements that apply to the System.

VIOLATIONS

7. Respondent is required to monitor the System's water annually for nitrate at every entry point to the distribution System which is representative of each well after treatment. 40 C.F.R. §§ 141.23(a) and (d). Respondent failed to monitor the System's water for nitrate during 2023 and 2024 and therefore, violated this requirement.
8. Respondent is required to monitor the System's water monthly for total coliform bacteria. 40 C.F.R. §§ 141.853-858. Respondent failed to monitor the System's water for total coliform bacteria during June 2023, September 2023, October 2024, and December 2024 and therefore, violated this requirement (Note: Respondent returned to compliance when it monitored the System's water for total coliform bacteria monthly since January 2025).
9. If the System does not treat its water to meet at least a 4-log, 99.9% removal of viruses, Respondent is required to conduct triggered source monitoring within 24 hours of being notified that a regular, routine total coliform monitoring sample is positive for total coliform. Respondent must sample each groundwater source and have it analyzed for a fecal indicator (e.g., *E. coli*). 40 C.F.R. § 141.402. Respondent failed to monitor the System's source for a fecal indicator within 24 hours on two occasions after being notified on July 7, 2023, and October 4, 2023, that samples taken on July 6, 2023, and October 2, 2023, respectively, were analyzed as total coliform positive, and therefore violated this requirement. 40 C.F.R. § 141.402. (Note: Note: Respondent returned to compliance when they monitored the System's source for a fecal indicator on August 10, 2023, and October 26, 2023).
10. If the System has more than one positive total coliform sample result in the distribution system within the same month or fails to take three total coliform repeat samples within 24 hours following a routine total coliform positive result, Respondent is required to conduct a Level 1 assessment and submit it to the EPA within 30 calendar days of learning of the positive monitoring results. 40 C.F.R. § 141.859. Respondent failed to conduct a Level 1 assessment following multiple positive total coliform sample results in the month of October 2023, and therefore,

violated this requirement. (Note: Respondent conducted a Level 1 assessment and submitted it to EPA in December 2023).

11. Respondent is required to notify the public of certain violations of Part 141 and, within 10 days after completing public notice, provide a copy of the public notice and certification to the EPA. 40 C.F.R. §§ 141.31(d) and 141.201-141.211. The violations identified in paragraphs 7, 8, and 9, above, are classified as Tier 3 violations, requiring public notices within 1 year, according to 40 C.F.R. § 141.204. Respondent failed to notify the public of the nitrate violations cited in paragraph 7, and the September 2023 total coliform bacteria violation in paragraph 8. Additionally, Respondent failed to notify the public of the nitrate violations cited in paragraph 9 except for failure to monitor the System's source for fecal indicator within 24 hours after being notified on October 4, 2023, that the sample taken on October 2, 2023, was analyzed as total coliform positive, and failed to submit copies of the public notices and certifications to the EPA and therefore, violated these requirements.
12. Respondent is required to notify the public of certain violations of Part 141 and, within 10 calendar days after completing public notice, provide a copy of the public notice and certification to the EPA. 40 C.F.R. §§ 141.31(d) and 141.201-141.211. The violations identified in paragraph 10, above, are classified as violations requiring Tier 2 public notice within 30 calendar days, according to 40 C.F.R. § 141.203. The EPA's records reflect that the Respondent failed to notify the public of the violation cited in paragraph 10 and failed to submit a copy of the public notice and certification to the EPA and therefore, violated this requirement.
13. Respondent is required to report any failure to comply with Part 141 to the EPA within 48 hours (except where Part 141 specifies a different time period). 40 C.F.R. § 141.31(b). Respondent failed to report the violations cited in paragraph 7 above, to the EPA and therefore, violated this requirement.
14. Respondent is required to report any violation of total coliform monitoring requirements to the EPA within 10 calendar days after discovering the violation. 40 C.F.R. § 141.861(a)(4). Respondent failed to report the violations

listed in paragraphs 8 and 9 above, to the EPA and therefore, violated this requirement.

ORDER

Respondent is ordered to perform the following actions upon Respondent's receipt of this Order (unless a different deadline is specified below):

15. Respondent is ordered to comply with all provisions of the Act and Part 141, including but not limited to each requirement cited above.
16. Within 30 calendar days after receipt of this Order, and as required by Part 141 thereafter, Respondent shall monitor the System's water for nitrate, in accordance with 40 C.F.R. §§ 141.23(a) and (d). Respondent shall report results to the EPA within the first 10 calendar days following the end of the required monitoring period. 40 C.F.R. § 141.31(a).
17. Respondent shall monitor the System's water monthly for total coliform bacteria. If a sample is positive for total coliform, within 24 hours of being notified of the positive result, Respondent shall collect a set of three repeat samples for each total coliform-positive sample. 40 C.F.R. § 141.853-858. Respondent shall report results to the EPA within the first 10 calendar days following the end of the required monitoring period. 40 C.F.R. § 141.31(a).
18. Within 24 hours of being notified that a routine total coliform monitoring result is positive, Respondent shall conduct source water monitoring as required by 40 C.F.R. § 141.402. If the sample is negative, Respondent shall report that result to the EPA no later than 10 calendar days after the end of the month in which the sample is taken. If a sample is *E. coli* positive, Respondent shall notify the EPA immediately for appropriate assistance 40 C.F.R. § 141.403(a)(4). Respondent shall comply with the treatment technique requirements, according to 40 C.F.R. § 141.403(a), and providing appropriate public notification pursuant to 40 C.F.R. § 141.402(g) within 24 hours as required by 40 C.F.R. § 141.202(b)(1). Thereafter, Respondent shall comply with all source water monitoring and related requirements in 40 C.F.R. § 141.402. When reporting any triggered source water sample result, Respondent shall specify that it is a triggered source water sample.

Respondent shall report results to the EPA within the first 10 calendar days following the end of the required monitoring period. 40 C.F.R. § 141.31(a).

19. Following any future instances of the System (1) having more than one positive total coliform sample result (including routine and repeat samples) within the same month, (2) failing to collect three repeat samples within 24 hours following a total coliform positive sample, (3) having an *E. coli* MCL violation, or (4) has a second Level 1 Assessment trigger within a rolling 12-month period, Respondent shall conduct the appropriate level of assessment in compliance with 40 C.F.R. § 141.859.
20. Within 30 calendar days after receipt of this Order, Respondent shall notify the public of the violations cited in paragraphs 7, 8 and 9, above. Thereafter, following any future violation of Part 141, Respondent shall comply with any applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 calendar days after providing public notice, Respondent shall submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d). Templates and instructions are available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#pn>.
21. Within 30 calendar days after receipt of this Order, Respondent shall notify the public of the violation cited in paragraph 10. Within 10 calendar days after providing public notice, Respondent shall submit a copy of the notice and certification to the EPA. 40 C.F.R. § 141.31(d). Templates and instructions are available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#pn>.
22. For any future violation of Part 141 for which this Order does not specify a reporting period, Respondent must report the violation to the EPA within 48 hours of the violation occurring, as required by 40 C.F.R. § 141.31(b). However, if Part 141 specifies a different time period for reporting the particular violation, Respondent must report the violation to the EPA within that different period.
23. If the population or number of connections served by the System at least 60 days of

the year falls below 25 individuals Respondent must notify the EPA in writing within 10 calendar days by submitting a completed basic information form. The form is available at: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#new>.

24. If Respondent (a) leases or sells the System to another person or entity, or (b) contracts with or hires any other person or entity to operate the System, Respondent must, within 10 calendar days, provide a copy of this Order to the lessee, purchaser, or contractor and notify the EPA in writing of the change. In either of these circumstances, Respondent will remain obligated to comply with this Order.
25. Respondent must send all reporting and notifications required by this Order to the EPA at:

Email: R8DWU@epa.gov, and carballal-broome.christina@epa.gov

GENERAL PROVISIONS

26. This Order is binding on Respondent, and any person (*e.g.*, employee, contractor, or other agent) acting in concert with Respondent.
27. This Order does not constitute a waiver, suspension, or modification of any requirement of the Act or Part 141. Issuance of this Order is not an election by the EPA to forgo any civil or criminal action.
28. Violation of any part of this Order, the Act, or Part 141 may subject Respondent to a civil penalty of up to \$71,545 (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; 90 Fed. Reg. at 1375 (January 8, 2025).
29. Respondent may seek federal judicial review of this Order pursuant to section

1448(a) of the Act, 42 U.S.C. § 300j-7(a).

Issued: September 29, 2025.

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