



REGION 8

DENVER, CO 80202

September 2, 2025

FILED

Sep 03, 2025

8:52 am

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

Ref: 8ECA-W-S

SENT VIA EMAIL
DIGITAL DELIVERY RECEIPT REQUESTED

Parkland USA Corporation
c/o Jake Thomas, Project Manager
Super Pumper/Sinclair #5
Jake.Thomas@parklandusa.com

Subj: Administrative Order Third Addendum, Parkland USA Corporation regarding
Super Pumper/Sinclair #5 Public Water System, PWS ID #WY5600298
Docket # **SDWA-08-2024-0029**

Dear Mr. Thomas:

This is the third Addendum to the Administrative Order (Order) issued to Parkland USA Corporation on May 25, 2024. The purpose of this letter is to approve the proposed schedule (Schedule) for coming into consistent compliance with the nitrate maximum contaminant level (MCL) submitted by Parkland USA on August 11, 2025. The Schedule is hereby incorporated into the Order pursuant to paragraph 10. Each milestone and deadline specified below is an enforceable provision of the Order.

<u>Milestone</u>	<u>Deadline</u>	<u>Projected Cost</u>
Quarterly sampling and analysis of nitrates.	Complete (Next quarterly sampling will be conducted by 9/30/25).	\$1,500
Sample collection for analysis of hardness and total suspended solids for potential treatment system design and installation.	Complete	\$1,400

<p>A State licensed water well driller will lower the existing pump to approximately 505 feet below top of casing. Prior to lowering the pump, the pump specifications will be assessed. If the existing pump is not suitable to deliver flow at that desired depth, a new pump will be specified and installed to accommodate the depth of 505 feet. The well will be disinfected with chlorine before water use.</p>	<p>September 30, 2025, contingent on availability of water well driller and issuance of permit, as needed.</p>	<p>\$20,000</p>
<p>Collect sample for nitrate analysis for comparison with maximum contaminant level (MCL)</p>	<p>Within one week following pump lowering</p>	<p>\$1,300</p>
<p>Assess other options to include:</p> <p>A. Alternative 1 - Redevelop the well and collect samples from the three screened intervals for nitrate analysis.</p> <p>B. Alternative 2 - Installation of one or two sleeves to seal the upper screened interval or intervals (180 to 260 feet and 320 to 380 feet). This option may require a smaller diameter pump.</p> <p>C. Alternative 3 - Install a new water supply well that is screened within a deeper interval than the suspected nitrate-impacted interval.</p> <p>D. Alternative 4 - Installation of a nitrate treatment system (ion exchange resin) or other options to be determined (e.g., reverse osmosis).</p>	<p>Within 30 days of receipt of nitrate analysis following lowering of the pump described above.</p>	<p>\$10,000 - \$20,000</p>

<p>If the nitrate concentration is not reduced below 10 mg/L by lowering the pump to the deeper aquifer, implement one or more of the options listed above. Other interim measures may be implemented, as necessary, pending receipt of permits and implementation of the selected option.</p>	<p>November 31, 2025</p>	<p>Alternative 2 - \$45,000 ± 25% (sealing existing upper well screens)</p> <p>Alternative 3 – \$85,000 ± 65% (installing a new well)</p> <p>Alternative 4 - \$50,000 - \$175,000 (system installation/ oversight) Does not include ongoing O&M & waste disposal costs.</p>
<p>Collect a sample for nitrate analysis for comparison with MCL.</p>	<p>As needed regarding sampling and implemented remediation options.</p>	<p>\$2,500</p>
<p>Reporting</p>	<p>As needed regarding sampling and implemented remediation options.</p>	<p>\$10,000-\$30,000</p>

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 nitrate MCL by the final date of November 31, 2025, specified in the approved Schedule. The EPA is authorized to seek penalties if these deadlines are not met. If Parkland USA 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.

*Subj: Third Administrative Order Addendum, Parkland USA regarding Super Pumper/Sinclair #5 Public Water System, PWS ID WY5600298 Docket # **SDWA-08-2024-0029***

If you have any questions or to request an informal conference with the EPA, please contact Marlon Bell via email at Bell.marlon@epa.gov, or by phone at (800) 227-8917, extension 6539, or (303) 312-6539. Any questions from Parkland USA's attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at bearley.mia@epa.gov or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

Sincerely,

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

ENCLOSURES

cc:

WY DEQ/DOH (via email)
Laramie County Commissioners
EPA Regional Hearing Clerk
Nancy Coen, Compliance & Environment
Jim Franz, Contract Operator
Josh Salyards, Contract Operator
Dennis Lewis, WY DEQ District Engineer
Lily Barkau, WY DEQ Natural Resources Program Manager