



REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129

December 23, 2024

Ref: 8WD-SDR

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Philip Wong, Civil Engineer
BTNF-Station Creek CG
340 North Cache Street
Jackson, Wyoming 83001
philip.wong@usda.gov

Re: **Notice of Noncompliance**
Revised Total Coliform Rule
Failure to Complete Corrective Action from Level 2 Assessment
PWS ID# WY5680135 NC

Dear Philip Wong:

The purpose of this letter is to inform you that BTNF-Station Creek CG has failed to complete the corrective action specified during your **May 29, 2024**, Level 2 Assessment as required by 40 C.F.R. § 141.859-141.860 of the National Primary Drinking Water Regulations (NPDWR). Level 2 Assessments are triggered when the water system has triggered two Level 1 Assessments in a rolling 12-month period or an *E. coli* maximum contaminant level (MCL) violation has been triggered. The corrective actions associated with a Level 2 Assessment were due 30 days after monitoring results triggered the Assessment or according to a timeframe approved by the EPA. Your system failed to meet the required timeframe for completing the corrective actions by **September 20, 2024**.

If you have already completed the corrective actions from the Level 2 Assessment, please forward a description and photographic evidence of all the corrections to our office using one of the methods listed below. Include your PWS name and PWS ID# on all correspondence.

Email: R8DWU@epa.gov

Fax: 1-877-876-9101

Mail: Refer to the address at the top of this letter. Use Mail Code 8WD-SDR on the envelope.

If you have not completed the corrective actions, please take the following actions:

- (1) Please contact EPA immediately and provide an update (including photos and dates) on the status of the sanitary defects identified during the Level 2 Assessment.
- (2) Notify your customers of this treatment technique violation when the CG re-opens in 2025 by issuing public notice no later than 30 days after the violation by posting the notice in conspicuous locations throughout the distribution system frequented by persons served by the system, or by mail or direct delivery to each customer and service connection (where known); **and** any other method reasonably calculated to reach other persons served by the system if they would not normally be reached by the first distribution method. Such persons may include those served who may not see a posted notice because the posted notice is not in a location they routinely pass by. Other methods may include: Publication in a local newspaper or newsletter distributed to customers; use of E-mail to notify employees or students; or, delivery of multiple copies in central locations (e.g., community centers). Enclosed is a copy of a public notice that meets all of the Federal requirements or you may consult <https://www.epa.gov/dwreginfo/public-notification-instructions-and-templates-revised-total-coliform-rule-rtcr> electronic templates. If the public notice is posted, the notice must remain in place for as long as the violation or situation persists, but in no case for less than seven days, even if the violation or situation is resolved.
- (3) Please forward a copy of your public notice to our office within ten days of completion.

You should be aware that repeated violations of the National Primary Drinking Water Regulations may result in formal enforcement action taken against your water system. If formal enforcement action becomes necessary, the Safe Drinking Water Act provides for civil penalties of up to \$69,733 per day of violation. We prefer to address problems before such formal enforcement is necessary and ask for your cooperation to resolve problems quickly and effectively.

If you have any questions, please contact Jamie Harris at 303-312-6072 or by email at harris.jamie@epa.gov.

Sincerely,

KYLE ST CLAIR

Digitally signed by KYLE ST
CLAIR
Date: 2024.12.23 15:10:00
-07'00'

Kyle St Clair Acting for Seth Tourney, Supervisor
Rule Implementation Section
Drinking Water Program

Enclosure(s)

cc:

Todd Stiles, District Ranger
Bridger-Teton Nat'l Forest
todd.stiles@usda.gov

Sanitary Defect	EPA REQUIRED ACTION	EPA REQUIRED DUE DATE	Violation Status
3.13	3.13 Disinfect both the upper and lower parts of the campground. To do this you will need to figure out how to disinfect the upper campground taps that don't receive water from the storage tank.	3.13 Send documentation that the upper and lower parts of the campground have been disinfected by <u>09/20/2024</u> .	3.13 EPA never received information that the upper and lower parts of the campground were disinfected and that is a violation of the Level 2 Assessment.
6.17a	6.17a Follow the 06/04/2024 Sample Siting Plan.	6.17a Follow the 06/04/2024 Sample Siting Plan.	6.17a In July, August, and September 2024 routine TC samples were collected at Faucet #2, Faucet #1 and Faucet #1, respectively. According to the 06/04/2024 sample plan samples were to be collected at Hydrant A, Hydrant #1, and Hydrant A. The sample plan wasn't followed and that is a violation of the Level 2 Assessment.

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Failed to Perform Activities Required

[Water System Name]

to Address Coliform Bacteria Contamination of the Water System

During recent routine monitoring, our water system tested positive for total coliforms. **Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, waterborne pathogens may be present or that a potential pathway exists through which contamination may enter the drinking water distribution system. We found coliforms indicating the need to look for potential problems in water treatment or distribution.*

*When this occurs, we are required to conduct assessments to identify problems and to correct any problems that are found.**

[Describe the TT violation, using the mandatory language of **We failed to conduct the required assessment* by [Enter date the assessment was due] and/or **We failed to correct all identified sanitary defects that were found during the assessment(s)* by [Enter date correction was due].**

As our customers, you have a right to know what happened and what we are doing to correct this situation.

What should I do?

- You do not need to boil your water or take other corrective actions. However, if you have specific health concerns, consult your doctor.
- If you have a severely compromised immune system, are pregnant, or are elderly, you may be at increased risk and should seek advice from your healthcare provider about drinking this water. You should also seek advice from your healthcare provider about using the water if you have an infant. General guidelines on ways to lessen the risk of infection by bacteria and other disease-causing organisms are available from EPA's Safe Drinking Water Hotline at 1-800-426-4791.

What does this mean?

Since total coliform bacteria are generally not harmful themselves, this is not an emergency. If it had been you would have been notified within 24 hours.

Failure to identify and correct the defects has the potential to cause continued distribution system contamination. Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and associated headaches.

What is being done?

[Describe corrective action including when your water system expects to return to compliance or resolve the violation.]

For more information, please contact _____ at _____ or _____.
[name of contact] [phone number] [mailing address]

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by _____ EPA Water System ID#: _____
[water system name]

Date distributed: _____.

ATTENTION: PWS OPERATOR/RESPONSIBLE PARTY

TT violations related to any Level 1 assessment or to a Level 2 assessment that is not triggered by an *E. coli* MCL violation require similar Tier 2 public notice. TT violations for Level 2 assessments that are triggered by *E. coli* MCL violations require different mandatory health effects language and are addressed in Template 2-22.

You must provide public notice to persons served as soon as practical but no later than 30 days after you learn of the violation [40 CFR 141.203(b)]. You must issue a repeat notice every three months for as long as the violation persists. Check with your state to make sure you meet all its requirements.

Community water systems (CWSs) must use one of the following methods to deliver the notice to consumers [40 CFR 141.203(c)]:

- Hand or direct delivery
- Mail, as a separate notice or included with the bill (if delivered within 30 days of the violation)
- Another method approved in writing by the state

Non-community water systems (NCWSs) must use one of the following methods to deliver the notice to consumers [40 CFR 141.203(c)]:

- Posting in conspicuous locations
- Hand delivery
- Mail
- Another method approved in writing by the state

In addition, both CWSs and NCWSs must use another method reasonably calculated to reach others if they would not be reached by the first method [40 CFR 141.203(c)]. Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, EPA recommends printing your notice on your system's letterhead, if available.

The notice on the reverse is appropriate for mailing, posting, or hand delivery. If you modify this notice, you must still include all required public notice elements from 40 CFR 141.205(a) and leave the mandatory language unchanged (see below). All posted notices must remain in place for as long as the violation or situation persists but in no case for less than seven days, even if the violation or situation is resolved.

Mandatory Language

Mandatory language on health effects (from Appendix B to 40 CFR 141 Subpart Q) must be included as written and is presented in this notice in italics with an asterisk on each end.

Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, waterborne pathogens may be present or that a potential pathway exists through which contamination may enter the drinking water distribution system. We found coliforms indicating the need to look for potential problems in water treatment or distribution. When this occurs, we are required to conduct assessments to identify problems and to correct any problems that are found.

You are also required to include one or both of the following statements, also presented in this notice in italics with an asterisk on each end, as appropriate for the violation:

We failed to conduct the required assessment.

We failed to correct all identified sanitary defects that were found during the assessment that we conducted.

You must also include standard language to encourage the distribution of the public notice to all persons served, where applicable [40 CFR 141.205(d)]. This language is also provided below and presented in this notice in italics with an asterisk on each end.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Corrective Action

The specific cause(s) of total coliforms in the distribution system that triggered the assessment will likely differ from system to system. Your notice must describe the corrective action(s) you are taking [40 CFR 141.205(a)(7)] to address the TT violation and when you expect to return to compliance or resolve the situation [40 CFR 141.205(a)(8)]. You can use one or more of the following statements, if appropriate, or develop your own text.

- We have begun to correct the sanitary defect(s) identified during an assessment of our water system by taking the following corrective actions: [Describe corrective actions].
- To ensure that our water system is protected against contamination, we are working with the state to implement the following corrective actions: [Describe corrective actions].
- We completed the required assessment and identified the cause of the sanitary defect to be addressed [describe the issue or problem found, for example, damage to the storage tank, a missing vent screen, etc.] We are currently correcting the problem on a schedule approved by [State Department of Public Health].

After Issuing the Notice

Make sure to send a copy of each type of notice and a certification (**see section below**) that you have met all the public notification requirements to your state within 10 days after the original or any repeat notice(s) [40 CFR 141.31(d)].

It is a good idea to inform your consumers when the violation has been resolved. See Template 1-6 of the Revised Public Notification Handbook (2nd Revision of Document: EPA 816-R-09-013, March 2010) and Template NC-7 of the Public Notification Handbook for Transient Non-community Water Systems, EPA 816-R-09-009, March 2010 for a "problem corrected" notice template.

Send the copy of your notice and certification to:

Email: R8DWU@epa.gov (Preferred)

Fax: 1-877-876-9101

Mail: Refer to the address at the top of your letter. Use Mail Code 8WD-SDR on the envelope.

If you have questions about your Revised Total Coliform Rule violation, please call Jamie Harris, the RTCR Manager at 303-312-6072.

CERTIFICATION OF PUBLIC NOTIFICATION

I _____ certify that the attached public notice was issued from
(PWS Operator/Responsible Party)

_____ to _____. The notice attached was issued by
(Date) (Date)

_____ for the RTCR Violation that occurred on _____.
(Method of delivery – by hand, mail, etc.) (Date)

Signature _____ Date _____

Public Water System Name: _____ PWS ID Number: _____