



REGION 4

ATLANTA, GA 30303

November 20, 2023

Mr. James Bowman Wiley, Jr.
Owner, CJT Group, LLC
301 Blue Bell Lane
Americus, Georgia 31210
wwautosales@mediacombb.net

Re: Request for Information Pursuant to Section 1445(a)(1) of the Safe Drinking Water Act, 42 U.S.C. § 300j-4(a)(1), Docket No. SDWA-1445-2024-01
PWS ID #s Arlington Terrace MHP - GA2610036, Graystone Village - GA2610045, Koinonia Forest Park - GA2610013, Koinonia Village - GA2610017, and Southern Hills Subdivision - GA2610039

Dear Mr. Wiley:

The U.S. Environmental Protection Agency is responsible for assuring public water systems (PWS) provide safe drinking water in accordance with the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300f et seq., and the National Primary Drinking Water Regulations (NPDWRs) promulgated thereunder at 40 C.F.R. Part 141. Based on information contained in the Safe Drinking Water Information System, the Arlington Terrace MHP Public Water System (Arlington Terrace PWS) serves approximately 38 people; Graystone Village PWS serves approximately 89 people; Koinonia Forest Park PWS serves approximately 84 people; Koinonia Village PWS serves approximately 70 people; and Southern Hills Subdivision PWS (Southern Hills PWS) serves approximately 149 people. Pursuant to Section 1401(15) of the SDWA, 42 U.S.C. § 300f(15), the Arlington Terrace, Graystone Village, Koinonia Forest Park, Koinonia Village, and Southern Hills PWSs (collectively, "the Systems") are therefore community water systems. Per Section 1411 of the SDWA, 42 U.S.C. § 300g, as community water systems, the Systems are subject to the requirements of the NPDWRs.

Section 1445(a)(1) of the SDWA, 42 U.S.C. § 300j-4(a)(1), and 40 C.F.R. § 141.31 authorize the EPA to require the submittal of information to determine whether a public water system is in compliance with federal drinking water regulations. Pursuant to Section 1445(a)(1)(B) of the SDWA, 42 U.S.C. § 300j-4(a)(1)(B), and after consultation with the Georgia Environmental Protection Division, (GA EPD), the EPA hereby requests that the Systems provide the information described in Enclosure A within 30 days of receipt of this letter. The EPA seeks this information to determine if the Systems are in compliance with the requirements of the SDWA and National Primary Drinking Water Standards.

The EPA encourages the submission of this information in electronic format to Ms. Whitney Buehler at buehler.whitney@epa.gov. If portions are unavailable in electronic format, please notify Ms. Buehler in your electronic submission that additional information is being sent in hardcopy to:

Ms. Whitney Buehler
Water Enforcement Branch
Enforcement and Compliance Assurance Division
US Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

Please be advised that, under Section 1445(c) of the SDWA, 42 U.S.C. § 300j-4(c), as amended by 40 C.F.R. § 19.4, Table 2 (Adjustment of Civil Monetary Penalties for Inflation), failure to provide the information required by this letter may result in a civil penalty of up to \$67,544. In addition, under SDWA Section 1414(g), 42 U.S.C. § 300g-3(g), failure to provide the information required by this letter may result in an order requiring compliance. Violation of such order may lead to sanctions under SDWA Section 1414, 42 U.S.C. § 300g-3(g)(3)(A) and 40 C.F.R. § 19.4, Table 2, which may include penalties of up to \$67,544 per day of violation. The information provided in response to this letter may be used by the United States in any enforcement proceeding related to this matter.

You may, if you so desire, assert a confidential business information (CBI) claim covering any or all the information furnished to the EPA in response to this letter. Every CBI claim must be made in a manner described in 40 C.F.R. § 2.203 and must be fully substantiated with documentary evidence which shows how the claim meets every criterion listed in 40 C.F.R. §§ 2.208 and 2.304. If no CBI claim accompanies your information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. Further details, including how to make a business confidentiality claim, are included in Enclosure B.

This request for information is not subject to review by the Office of Management and Budget (OMB) under the Paper Reduction Act because it is not an “informal collection request” within the meaning of 44 U.S.C. §§ 3502(4), (11), 3507, 3512, and 3518. Furthermore, it is exempt from OMB review under the Paper Reduction Act because it is directed to fewer than 10 persons. See 44 U.S.C. § 3502(4), (11); 5 C.F.R. § 1320.5(a).

If you have any questions regarding this matter, please contact Ms. Buehler of my staff at (404) 562 9739 or at the email address provided above. For legal inquiries, please have your attorneys contact Stephanie Gray, Associate Regional Counsel, at (404) 562-8251 or at gray.stephanie@epa.gov.

Sincerely,

Myers, Bryan Digitally signed by Myers, Bryan
Date: 2023.11.20 09:07:46
-05'00'

For Mary Jo Bragan, Chief
Water Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosures (2)

cc: Manny Patel, GA EPD
manny.patel@dnr.ga.gov

Lisa Myler, GA EPD
lisa.myler@dnr.ga.gov

ENCLOSURE A

**INFORMATION REQUEST PURSUANT TO SECTION 1445(a)(1)(B)
OF THE SAFE DRINKING WATER ACT**

Instructions

1. Identify the person(s) responding to this Information Request.
2. Please provide a separate narrative response to each and every question and subpart of a question set forth in this Information Request.
3. Precede each answer with the text and the number of the question and its subpart to which the answer corresponds.
4. All documents submitted must contain a notation indicating the question and subpart of the question to which they are responsive.
5. In answering each Information Request question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.
6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA as soon as possible.
7. Where specific information has not been memorialized in a document, but is nonetheless responsive to a question, you must respond to the question with a written response.
8. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.
9. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
10. The EPA requests that all documents provided in an electronic format be compatible with pdf.
11. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.
12. You may submit the requested information using a shared online repository.

13. If any question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Safe Drinking Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.
2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.
3. The terms “And” and “Or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
4. The term “Arlington Terrace PWS” means the Arlington Terrace MHP Public Water System, PWS ID GA2610036.
5. The term “Graystone Village PWS” means the Graystone Village Public Water System, PWS ID GA2610045.
6. The term “Koinonia Forest Park PWS” means the Koinonia Forest Park Public Water System, PWS ID GA2610013.
7. The term “Koinonia Village PWS” means the Koinonia Village Public Water System, PWS ID GA2610017.
8. The term “GA EPD” means the Georgia Environmental Protection Division.
9. The term “NPDWRs” means the National Primary Drinking Water Regulations, promulgated at 40 C.F.R. Part 141.

Questions

1. Pursuant to Ga. Comp. R. & Regs. 391-3-5-.17, design and construction of all public water systems shall conform to the latest edition of the Division's "Minimum Standards for Public Water Systems." Section 4.17.d of the “Minimum Standards for Public Water Systems” requires adequate intrusion deterrence, including fencing. During the EPA’s Compliance Evaluation Inspection on June 16, 2023, the EPA found multiple opportunities for uncontrolled access to the Systems. The fences surrounding Arlington Terrace, Koinonia Village, and Koinonia Forest Park PWSs were falling down in several locations, providing access points to the PWSs. The knee-high picket fence at Graystone Village PWS does not provide adequate site security, as it can be stepped over to gain entry to the PWS.

Provide documentation of any corrective actions taken to address the inadequate fencing at the Arlington Terrace, Graystone Village, Koinonia Forest Park, and Koinonia Village PWSs. Documentation can include, but is not limited to, contracts, scopes of work, or any additional capital improvement project plans and/or evidence of actions taken to address these findings.

2. Ga. Comp. R. & Regs. R. 391-3-5-.14(2) requires the supplier of water to continuously chlorinate the water to maintain a detectable residual of free chlorine in all parts of the distribution system. During the EPA's Inspection, the EPA found that the Graystone Village PWS was not dosing raw water with chlorine due to a clog in the tubing at the time of the Inspection.

Provide documentation of any corrective actions taken to address the malfunctioning chlorine pump at the Graystone Village PWS. Documentation can include, but is not limited to, contracts, scopes of work, or any additional capital improvement project plans and/or evidence of actions taken to address this finding.

3. Ga. Comp. R. & Regs. R. 391-3-5-.09(d) requires chemical feed equipment to be of such design and capacity to accurately supply, at all times, the treatment chemicals required. During the EPA's Inspection, the EPA found a malfunctioning backflow prevention device on the chlorine injection port at Graystone Village PWS, which may have resulted in the dilution of the chlorine supply.

Provide documentation of any corrective actions taken to address the malfunctioning backflow prevention device on the chlorine injection port at the Graystone Village PWS. Documentation can include, but is not limited to, contracts, scopes of work, or any additional capital improvement project plans and/or evidence of actions taken to address this finding.

4. Paragraph 6.1.e. of the "Minimum Standards for Public Water Systems" requires that the minimum effective storage volume of pressure tanks to equal the peak demand, minus the pumping capacity, multiplied by 20. During the EPA's Inspection, the EPA found that the storage capacity at Koinonia Forest Park PWS was insufficient for the required storage capacity as calculated by GA EPD. The owner of the PWS was notified by GA EPD of the updated storage capacity requirement on October 26, 2022, and was given thirty days to submit plans and specifications for the modification of the storage. The PWS did not submit a plan within thirty days and has not met the Minimum Standards.

Provide documentation of any corrective actions taken to address the inadequate storage capacity at Koinonia Forest Park PWS. Documentation can include, but is not limited to, contracts, scopes of work, or any additional capital improvement project plans and/or evidence of actions taken to address this finding.

ENCLOSURE B

RIGHT TO ASSERT BUSINESS CONFIDENTIALITY CLAIMS

(40 C.F.R. Part 2)

Except for information which deals with the existence, absence, or level of contaminants in drinking water, you may, if you desire, assert a business confidentiality claim as to any or all of the information that the EPA is requesting from you. Applicable EPA regulations relating to business confidentiality claims are at 40 C.F.R. Part 2 and 40 C.F.R. § 2.304(e).

If you assert such a claim for the requested information, the EPA will only disclose the information to the extent and under the procedures set out in the cited regulations. If no business confidentiality claim accompanies the information, the EPA may make the information available to the public without any further notice to you.

40 C.F.R. § 2.203(b). **Method and time of asserting business confidentiality claim.** A business which is submitting information to the EPA may assert a business confidentiality claim covering the information by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential.” Allegedly confidential portions of otherwise non confidential documents should be clearly identified by the business and may be submitted separately to facilitate identification and handling by the EPA. If the business desires confidential treatment only until a certain date or until the occurrence of a certain event, the notice should so state.