



REGION 10
SEATTLE, WA 98101

June 24, 2024

Ryan Wynn
Water & Wastewater Services
14263 Calhoun Road
Mt Vernon, WA 98273

Failure to Submit Corrosion Control Treatment Recommendation, Stillaguamish Village, PWS ID 105338118

Dear Mr. Wynn:

The Environmental Protection Agency (EPA) has not received a corrosion control treatment recommendation for Stillaguamish Village, which constitutes a violation of the National Primary Drinking Water Regulations [[40 CFR 141.80\(k\)](#)]. On August 3, 2023, Stillaguamish Village received notification from EPA of a copper action level exceedance (ALE). This letter also outlined required follow up actions as a result of the ALE, including the submission of a corrosion control treatment recommendation by March 1, 2024 [[40 CFR 141.81\(e\)\(1\)](#)].

To return to compliance Stillaguamish Village must either:

1. If a corrosion control treatment recommendation was already completed, submit it to R10TribalDW@epa.gov as soon as possible.

-OR-

2. Develop a corrosion control treatment recommendation and submit it to R10TribalDW@epa.gov as soon as possible. Please contact EPA or your technical assistance provider for assistance.

Additionally, Stillaguamish Village must:

1. Distribute Tier 2 Public Notification (PN) **within 30 days** of receiving this letter and **every three months afterwards** until the violation has returned to compliance [[40 CFR 141.203\(b\)](#)].

-AND-

2. Submit a copy of the PN that was distributed and the completed PN Certification Form to R10TribalDW@epa.gov within 10 days after issuing the notice [[40 CFR 141.31\(d\)\(1\)](#)].

A Public Notification template, instructions, and certification are enclosed to assist you with completing the requirements.

This letter serves as initial notification of non-compliance under the Safe Drinking Water Act for the regulation and time period cited. The Environmental Protection Agency (EPA) supports compliance assistance and encourages early action to return to compliance. Issues not addressed in a timely manner may be referred to enforcement. Prior to an enforcement action for the cited violation(s), EPA Region 10 will offer government-to-government consultation, in accordance with the [EPA Policy on Consultation and Coordination with Indian Tribes](#).

A list of all violations and their status can be viewed at any time by visiting Drinking Water Watch: <https://sdwisdww.epa.gov/DWWR10/>. Please contact R10TribalDW@epa.gov with questions.

Sincerely,

Ryan J. Gross
Acting Manager
Groundwater and Drinking Water Section

cc: Seth Young, Water & Wastewater Services
Danielle J. Russell, EFC Region 10/RCAC

Instructions for Failure to Submit a Corrosion Control Treatment

Since lead and copper treatment technique violations require Tier 2 public notification, you must provide Tier 2 public notification to persons served as soon as practical but within 30 days after you learn of the violation [\[40 CFR 141.203\(b\)\]](#). Check with your primacy agency to make sure you meet its requirements.

Community systems must use one of the following [\[40 CFR 141.203\(c\)\]](#):

- Hand or direct delivery
- Mail, as a separate notice or included with the bill
- Another method approved in writing by the EPA

Non-community systems must use one of the following [\[40 CFR 141.203\(c\)\]](#):

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

In addition, both community and noncommunity systems 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, print your notice on your system's letterhead, if available.

The following notice is appropriate for is appropriate for mailing, posting, or hand delivery. If you do modify the notice, you must still include all required PN elements from [40 CFR 141.205\(a\)](#) and leave the mandatory language unchanged (see below).

Mandatory Language

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

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 presented in this notice in italics and with an asterisk on either end.

Corrective Action

In your notice, describe corrective actions you are taking. You can include the following statement, if appropriate, or develop your own text:

- We are working to develop a corrosion control treatment recommendation to submit to EPA for approval.

If consumers ask for information on testing their water, you should have on hand the names of laboratories consumers can call. Tell consumers to call NSF International at 1(800) NSF-8010 or the Water Quality Association at 1(800) 749-0234 for information on appropriate filters. For more information on lead, have consumers visit the EPA Ground Water and Drinking Water Website at <https://www.epa.gov/ground-water-and-drinking-water>.

After Issuing the Notice

Make sure to send your primacy agency a copy of each type of notice and a certification that you have met all the public notice requirements within ten (10) days after issuing the notice [\[40 CFR 141.31\(d\)\]](#).

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Water Contains High Levels of Lead and/or Copper

Public Water System: Stillaguamish Village Date distributed: _____

Our water system recently violated a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we did (are doing) to correct this situation.

We routinely sample water at consumers' taps for lead and copper. The tests show lead and/or copper levels in the water were above the limit, or "action level," so we are required to develop a corrosion control treatment recommendation for review by EPA. This treatment helps prevent lead and/or copper in the pipes from dissolving into the water. The treatment recommendation should have been submitted by 3/1/2024 but was not.

What does this mean?

This is not an emergency. If it had been, you would have been notified within 24 hours. Typically, lead and copper enter water supplies by leaching from pipes and plumbing components. Older homes may contain lead or copper pipes. Your water is also more likely to contain high levels if water pipes in or leading to your home are made of lead or contain lead solder.

Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure.

Copper is an essential nutrient, but some people who drink water containing copper in excess of the action level over a relatively short amount of time could experience gastrointestinal distress. Some people who drink water containing copper in excess of the action level over many years could suffer liver or kidney damage. People with Wilson's Disease should consult their personal doctor.

What should I do?

Listed below are some steps you can take to reduce your exposure:

- Call us at the number below to find out how to get your water tested for lead and copper.
- Find out whether your pipes contain copper, lead or lead solder.
- Run your water for 15-30 seconds or until it becomes cold before using it for drinking or cooking. This flushes any standing lead or copper from the pipes.
- Don't cook with or drink water from the hot water tap; lead and copper dissolves more easily into hot water.
- Do not boil your water to remove lead or copper. Boiling water makes the lead and copper more concentrated because it remains when the water evaporates.

What is being done?

We will/did submit a corrosion control treatment recommendation on ____ / ____ / ____.

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.

Contact Person: _____ Phone: _____

EPA Region 10 Tier 2 Public Notification Certification Form

Public Water Systems must provide initial Tier 2 public notice as soon as practical, but no later than **30 days** after EPA's Notice of Violation Letter. You must repeat Tier 2 public notices **every three months** until the violation has returned to compliance.

Complete the section which corresponds to your water system type.

Community Water Systems:

☐ Public notice mailed or directly delivered to all consumers receiving water within the form, manner and frequency required in [40 CFR 141.203](#).

Provide information of another method used to reach others regularly served if they would not normally be reached by the method above. Such methods could include posting in public places or internet, newspapers, email, social media, delivery to community organizations, etc.

Describe alternate method:

Non-Community Water Systems:

☐ Public notice posted at _____ within the form, manner and frequency required in [40 CFR 141.203](#).

Provide information of another method used to reach others served if they would not normally be reached by the method above. Such methods could include mail, posting on the internet, newspapers, email, social media, delivery to community organizations, etc.

Describe alternate method:

I hereby affirm that public notice has been provided to consumers in accordance with the delivery, content, format, and deadlines required in [40 CFR Part 141 Subpart Q](#).

Stillaguamish Village
Water System Name

105338118
PWS ID#

Signature

Date

Email a copy of the public notice and this certification form within **10 days** of completing initial public notice or any repeat public notice to: R10TribalDW@epa.gov