

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 8			
DRINKING WATER ENFORCEMENT INSPECTION (8ECA-W-S)			
Section A: Facility Data			
Public Water System (PWS) Name: Bridger Teton National Forest Hoback Campground		Location: Jackson, Wyoming	System Type: ☐ Community ☒ Transient Non-Community ☐ Non-Transient Non-Community
PWS Identification (ID) #: WY5680139		Date of Last Site Visit: 2024-07	
Unannounced Inspection? ☐ Y ☒ N	Population Served: 50	Water Source: ☒ Ground Water ☐ Surface Water (SW) ☐ Ground Water Under Direct Influence SW	Other System Data (e.g., other descriptive information): N/A
Name(s) and Email(s) of Owner(s): Philip Wong, Philip.wong@usda.gov Name(s) of on-site representative(s) and title(s): Philip Wong, Civil Engineer			
Section B: Background Information			
Inspection Date: September 11, 2024 Lead EPA Inspector: Matt Findley Additional EPA Inspector(s): Jessica Moore, Marlon Bell, Elizabeth Tyson. Additional EPA Representatives Present: none Enforcement Action Issued: November 29, 2023 (SDWA-08-20204-0006) Prior Enforcement Action(s) / Date(s)? none Directions to PWS: The Hoback Campground is on the south side of US Highway 189/191, approximately 7.9 miles east of Hoback Junction. The road serving the campground from the highway has been assigned Forest Service Road 30492. Photo 1 shows the campground entrance from the highway.			
Order Violation(s)/Date(s): • Failure to conduct monthly monitoring for total coliform bacteria during August 2020. This is a violation of the Revised Total Coliform Rule, 40 CFR §§141.853-858. • Respondents were notified of significant deficiencies on August 20, 2021, but failed to complete corrective action of the significant deficiencies by July 28, 2022 (120 days after receiving notice of the significant deficiencies). This violates corrective action requirements in the Groundwater Rule, 40 CFR §141.404(a). • Failure to notify the public of the Revised Total Coliform Rule monthly monitoring violation and the Groundwater Rule corrective action violation. These failures violate requirements in the Public Notification of Drinking Water Violations regulations, 40 CFR §§141.203-204.			

Order Requirements:	Inspected?		Status of Requirements	
	Yes	No	Completed	Not Completed
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, collect a set of 3 repeat samples for each total coliform-positive sample.		X	X	
Consult with EPA and submit proposed schedule to correct significant deficiencies.	X		X	
Correct significant deficiencies and submit correction form with photos to EPA.	X			X

Section C: Inspection Purpose

Purpose: Evaluate status of violations and corrective actions identified in the Administrative Order issued November 29, 2023. The order specifically identifies two significant deficiencies from the October 15, 2019, sanitary survey (reported August 20, 2021) where corrective action is required:

- Ensure that the top of casing elevation for the water system's well (Well #1 also known as WL01) terminates at least 3 feet above the 100-year floodplain or the highest known flood elevation, whichever is higher.
- Ensure that the well house remains always accessible to allow for access to system components in the event of an emergency. Either install a new bridge across the river at the campground, create a maintained trail from road on the south side of the river that goes to the wellhouse, or abandon WL01 and develop an alternative.

The purpose of the inspection was to evaluate the U.S. Forest Service's progress towards completing the corrective actions and resolving the administrative order.

Section D: Areas Evaluated During Inspection (check only those evaluated)							
Enforcement Action Compliance	X	Sampling		Ownership Verification		Maintenance Records	
Facility Tour	X	Compliance w/ Plan		Photos Attached	X		

Section E: Preliminary Findings

Inspection Timing and Participants: Notice of the inspection was provided to Bridger Teton National Forest (the water system owner) by an August 27, 2024, email and two preceding voicemails. EPA inspectors arrived at the campground at noon and met the campground host. Forest Service Representative Phillip Wong arrived at 12:30 pm. The opening conference was held outdoors near the campground entrance where EPA staff presented credentials and discussed the scope of the inspection (review progress towards resolving the November 2023 administrative order).

Accessibility of Water Supply Well: The campground's water supply well was previously accessible by a bridge over the Hoback River located at the entrance to the campground. Originally, there were campsites on both sides of the river. The bridge was reportedly destroyed in the 1980s by an ice jam. An historic aerial photo from 1983 shows the bridge, while another photo from 1989 does not show it (<http://maps.tetonconservation.org/>). The campground and its water supply have been operating without a bridge for at least 35 years. Photo 3 shows the pilings and south bulkhead for the former bridge.

At the time of the inspection, the segment of the Hoback River separating the campground from the water supply well was approximately 120 feet wide. Inspectors did not attempt to wade the river, however it appeared to be no more than knee deep and with a cobble bottom (see photo 4). Several fly fishers were wading in the river at the time of the inspection. The Forest Service representative, Phil Wong, indicated that they can ford this section of the river during low water using all-terrain vehicles (ATVs).

The campground host and Forest Service representative indicated that the river exhibits seasonal discharge patterns with the highest flows during Spring runoff and the lowest flows in the Fall (the Hoback River is part of the Snake River Headwaters Wild and Scenic River area and is free flowing without dams or reservoirs). Photos 5 through 8 show indicators of ordinary high water for the river. The campground host reported that a Teton County Search and Rescue boat is used get campground hosts to the water supply well on the other side of the river during higher flows at the beginning of each season to turn the water system on.

During the inspection, EPA inspectors and the Forest Service representative inspected the campground's water supply well by hiking along an old, overgrown road running along the south side of the Hoback River. This former road was accessed from a pull-off approximately 400 feet east of a bridge where US Hwy 189/191 crosses to the south side of the Hoback River (drive approximately 0.7 miles east from the campground). The hike begins as a two-track road (see photo 9) and reduces to a faint single-track foot trail within 200 yards (0.1 miles) of the pull out. Inspectors encountered thick brush and several downed logs/trees blocking the trail (see photos 10 and 11) during the hike to the water supply well. When inspectors attempted to navigate straight across Buck Creek (approximately 0.5 miles from the pull out) they encountered steep, hard-to-navigate slopes on both sides of the channel. A more accessible trail that roughly followed contours of the terrain was discovered on the return trip from the water supply well. In either case, ankle-deep wading and rock hopping were required to cross Buck Creek at the time of the inspection. The 0.9 mile hike (one-way) to the campground's water supply well from the pull-out took approximately 30 to 40 minutes. The hike was easy to moderate (one creek crossing and several log crossings) and was essentially level (if the footpath contouring around Buck Creek is used). Downed logs and brush along the former road preclude access to the water supply well using ATVs or off-highway vehicles (OHVs).

Water Supply Well Height Relative to Flood Elevation: The campground's water supply well is located in a wellhouse built on a slab-on-grade concrete pad (approximately 12 feet by 12 feet). The well is located on the south edge of the campsites that were used prior to the bridge washing out, approximately 50 yards from Hoback River. Remnants of paved paths and picnic tables from the old campground were observed in this area during the inspection (see photos 12 and 13). The well's position on the landscape is at the toe of a hillslope on an alluvial terrace associated with the Hoback River (see photo 14). EPA inspectors observed that the top of the wellhead was less than six inches above the concrete slab that surrounds it (see photos 15 and 16). The Forest Service representative did not know the elevation of the well's top-of-casing, either in absolute feet above mean sea level or relative to the Hoback River. The Forest Service has also not estimated the 100-year flood elevations for this segment of the Hoback River.

The United States Geological Survey (USGS) topographic map covering the Hoback Campground shows the elevation of the water supply well at approximately 6,200 feet above mean sea level (North American Vertical Datum of 1988).

The Federal Emergency Management Agency (FEMA) has a Flood Insurance Rate Map (FIRM) for this area (map number 56039C3200E, revised September 16, 2015) and it depicts areas along the Hoback River subject to a 100-year flood (i.e. “special flood hazard areas (SFHAs) subject to inundation by the 1% annual chance flood”), however no base flood elevations were determined by FEMA. The campground’s water supply well plots within FEMA flood boundaries. EPA inspectors suggested that the Forest Service contact the Wyoming Department of Transportation and research the flood elevations used when designing the highway bridges that cross Hoback River east and west of the campground.

Monthly coliform monitoring. Interviews with the Forest Service representative indicates that the campground operator, AuDi Campground Services (see photo 2), collects the monthly coliform samples required for the public water system. The Forest Service and operator has more than six campground water systems that they sample. Missed samples are currently rare and the Forest Service is addressing these with the operator on a programmatic level.

Closing Conference: After hiking to and inspecting the campground’s water supply well, a closing conference was held at approximately 2:30 pm. The compliance schedule prepared by the Forest Service was reviewed. EPA inspectors reminded the Forest Service representative that the schedule was binding and that revisions to the schedule must be submitted to and approved by EPA Region 8’s Enforcement and Compliance Assurance Division (R8 ECAD). The next item on the schedule is contacting Wyoming DEQ for a permit to modify the well and is due by the end of October 2024. EPA inspectors and the Forest Service representative agreed that quarterly reports will be submitted 15 days after the end of the calendar year quarter and that the next quarterly report is due October 15. EPA inspectors advised the Forest Service representative to frame the issue of wellhead access and protection from flooding in the broader context of Bridger Teton National Forest’s existing efforts with flood and wildfire disaster preparation, response, recovery, and mitigation.

Other Info: EPA Inspectors learned after the inspection that the USGS maintains gauging station 13019500 on the Hoback River, approximately 4.7 miles downstream from the water supply well. Discharge and stage data from this gauging station may be used to estimate wellhead elevation needed to protect the water well from flooding. Records extend back to 1917 but are discontinuous. Most records are from 1944 to 1958 and from 2022 to present.

Name(s) and signature(s) of inspectors:

Form completed by: Matt Findley

Admin review: Joan Detty

Technical review: Jessica Moore, Marlon Bell, Elizabeth Tyson

Lead Inspector Signature: _____

Additional Inspector Signature: _____

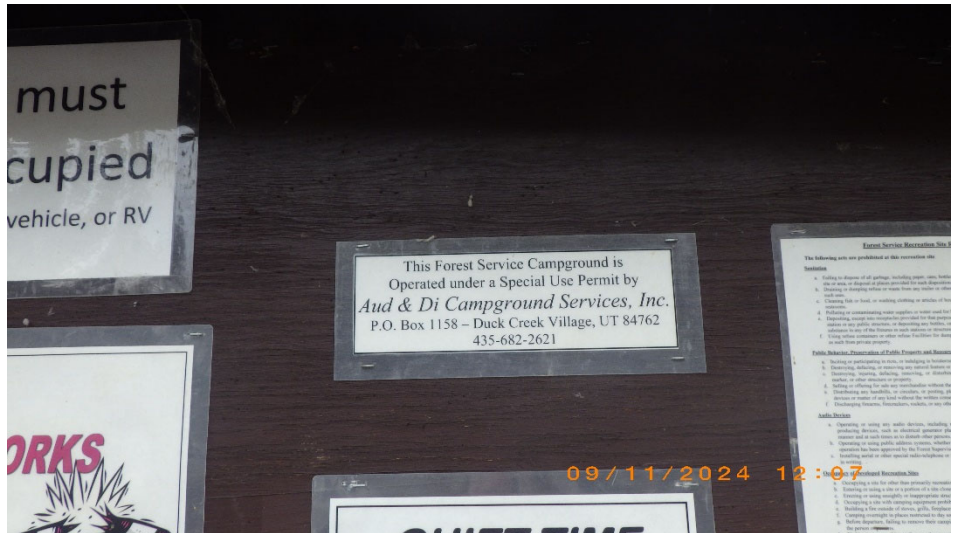
**Inspection Report Addendum
Drinking Water Enforcement Photographic Log**

PWS Name: Hoback Campground Public Water System

PWS ID#: WY5680139

Inspection Date: September 11, 2024

U.S. Environmental Protection Agency Region 8			
Facility Location: Jackson, Wyoming		Photographer: Matt Findley	Camera Make/Model: Ricoh WG-60
Dates Photographs Were Taken: 9/11/2024			
Photo No. 1 of 17	Time: 12:09		
Direction Photo Taken: East			
Photo Description: Entrance to the campground (Rd 30492) viewed from the shoulder of eastbound Hwy 189.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Jackson, Wyoming		Photographer: Matt Findley	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 2 of 17	Time: 12:07		
Direction Photo Taken: West			
Photo Description: Sign near campground entrance displaying contact info for the campground's concessionaire, "Aud & Di Campground Services, Inc.". Forest Service representative Philip Wong indicated that they are also involved in operation of the water system.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Matt Findley	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 3 of 17	Time: 12:04		
Direction Photo Taken: East			
Photo Description: Hoback River looking upstream from north bank at campground. Wooden piles from old bridge in center. River was wadable at time of inspection with several fly fishers in the water.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Matt Findley	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 4 of 17	Time: 12:04		
Direction Photo Taken: South			
Photo Description: Cobbles in bottom of Hoback River. This type of bed dominated the stretch of the Hoback River beside the campground. River was wadable at the time of inspection.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Matt Findley	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 5 of 17	Time: 12:39		
Direction Photo Taken: Southeast.			
Photo Description: Hoback river viewed from north bank at campground. Wooden piles midstream and bulkhead on south bank are from old bridge. Structures display indications of ordinary high water for the river.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Unknown	Camera Make/Model: Unknown
Dates Photographs Were Taken: Unknown			
Photo No. 6 of 17	Time: Unknown		
Direction Photo Taken: East			
Photo Description: Undated photograph of Hoback River reportedly near seasonal high water during Spring runoff. Note river stage relative to the former bridge piling near the ordinary high water mark. Photo provided to EPA inspectors by campground host during the inspection.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Matt Findley	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 7 of 17	Time: 12:39		
Direction Photo Taken: South			
Photo Description: Old bridge bulkhead along south bank of Hoback River at the campground. Ordinary high water mark indicators on pilings.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Unknown	Camera Make/Model: Unknown
Dates Photographs Were Taken: Unknown			
Photo No. 8 of 17	Time: Unknown		
Direction Photo Taken: South			
Photo Description: Undated photograph of Hoback River reportedly near seasonal high water during Spring runoff. Note river stage relative to the former bridge bulkhead at the ordinary high water mark. Photo provided to EPA inspectors by campground host during the inspection.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 9 of 17	Time: 12:51		
Direction Photo Taken: West			
Photo Description: Former road on south side of the Hoback River used by EPA inspectors and Forest Service representative to access the campground's water supply well on foot.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 10 of 17	Time: 12:54		
Direction Photo Taken: West			
Photo Description: Vegetation regrowing on the former road used to access the campground water supply well.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 11 of 17	Time: 13:16		
Direction Photo Taken: West			
Photo Description: Forest understory regrowing in the former road.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 12 of 17	Time: 13:35		
Direction Photo Taken: South			
Photo Description: Regrowth in the old campsites on the south bank of the Hoback River. This area is adjacent to the campground's water supply well. Note moss-covered pavement from former campsite roads in foreground on left.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 13 of 17	Time: 13:35		
Direction Photo Taken: North			
Photo Description: Regrowth in the old campsites on the south bank of the Hoback River. Old concrete supports for picnic tables visible on right edge of photo. Hoback River in background on right.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 15 of 17	Time: 13:30		
Direction Photo Taken: East and down			
Photo Description: Campground water supply well and EPA inspector recording latitude/longitude as measured by GPS receiver on his phone.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 16 of 17	Time: 13:32		
Direction Photo Taken: Down			
Photo Description: Wellhead for the Hoback Campground water supply well.			

U.S. Environmental Protection Agency Region 8			
Facility Location: Hoback Campground		Photographer: Jessica Moore	Camera Make/Model: Ricoh WG-5
Dates Photographs Were Taken: 9/11/2024			
Photo No. 17 of 17	Time: 13:36		
Direction Photo Taken: South			
Photo Description: Gravel bar on south bank of the Hoback River. Power line visible in top left of photo serves the campground's water supply well.			