



REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129

March 14, 2025

Ref: 8WD-SDP

SENT VIA EMAIL

Chuck Lancaster – Owner/Manager
Juby's Mobile Home Park
938 19th Street #1
Cody, WY 82414
lancaster.c1@mac.com

Re: Safe Drinking Water Act **Notice of Noncompliance**
Lead and Copper Rule Revisions (LCRR)
Failure to Develop an Initial Service Line Inventory
Failure to Submit an Initial Service Line Inventory
PWS ID# WY5601496

Dear Chuck Lancaster:

The purpose of this letter is to inform you that, based on information available to the United States Environmental Protection Agency (EPA), the Juby's Mobile Home Park Public Water System (System) has failed to (1) develop its initial service line inventory, and (2) submit it to the EPA by October 16, 2024, as required by the Safe Drinking Water Act's (SDWA) National Primary Drinking Water Regulations (NPDWR), 40 C.F.R. §§ 141.84 and 141.90, respectively.

Please address each of the items below:

1. In accordance with 40 C.F.R. § 141.84(a)(1) of the National Primary Drinking Water Regulations (NPDWR), all community water systems and non-transient, non-community water systems must develop an initial service line inventory no later than October 16, 2024. The EPA did not

receive documentation that the system developed a service line inventory by the specified deadline.

This is a violation of the NPDWR. Please take the following actions as soon as possible:

- a. Develop an initial service line inventory. 40 C.F.R. § 141.84(a)(1).
 - i. Include all service lines connected to the public water distribution system regardless of ownership status. 40 C.F.R. § 141.84(a)(2).
 - ii. Review records and sources of information listed in 40 C.F.R. § 141.84(a)(3) and (5).
 - iii. Categorize each service line, or portion of the service line where ownership is split, as lead, galvanized requiring replacement (GRR), non-lead, or lead status unknown, according to 40 C.F.R. § 141.84(a)(4).
 - iv. Include a location identifier (e.g., street address) for each lead and GRR service line. However, the EPA recommends that the initial service line inventory include location identifiers for all service lines, including for lead status unknown service lines. 40 C.F.R. § 141.84(a)(8).

More information on developing an initial service line inventory, including guidance, templates, and fact sheets, can be found on the EPA's website at <https://www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-and-tribal-lands-epa-region-8>.

- b. Make the initial service line inventory publicly accessible. 40 C.F.R. § 141.84(a)(8).
 - i. When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines (regardless of ownership) in its inventory, it may comply with the public accessibility requirement using a written statement declaring that the distribution system has no lead or galvanized requiring replacement lines and including a general description of all sources described in § 141.84(a)(3) and (5) that were used to make this determination. 40 C.F.R. § 141.84(a)(9).
- c. Submit an inventory of service lines plus any necessary documentation to the EPA that demonstrates that the service line inventory was developed according to the regulatory requirements in 40 C.F.R. § 141.84(a)(1)-(5), (8) and (9).

A water system can document how the service line inventory was made publicly accessible and was developed according to the regulatory requirements by completing and submitting to the EPA the full *EPA Service Line Inventory Template* or the *Service*

Line Inventory - Compliance Documentation Template. Templates can be found at <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#lsli>.

- d. Failure to develop an initial service line inventory is a treatment technique violation and requires a Tier 2 Public Notice (PN). 40 CFR §141.80(b) and 40 C.F.R. Appendix A to Subpart Q of Part 141. You must notify your customers of this Tier 2 violation by issuing a PN as soon as practical but **no later than 30 days after receiving this letter**. 40 C.F.R. § 141.203(b)(1). A Tier 2 PN must be issued via mail or direct delivery to each customer. In addition, you must use another method reasonably calculated to reach other persons regularly served by the system if they would not normally be reached by mail or direct delivery. The PN must be repeated every three months until the violation is resolved and the system has returned to compliance. 40 C.F.R. § 141.203(b)(2). Enclosed is the *Tier 2 and Tier 3 PN Template for LCRR*, which includes *Failure to Develop Initial Inventory for Service Line Materials – Template 2*.
 - e. Provide the EPA with a copy of your PN and PN certification within 10 days after issuing the notice, via email at R8DWU@epa.gov, or fax at 303-312-7517. A copy of the PN certification form is located at the bottom of the enclosed *Tier 2 and Tier 3 PN Template for LCRR*.
2. In accordance with 40 C.F.R. § 141.90(e)(1) of the National Primary Drinking Water Regulations (NPDWR), all community water systems and non-transient, non-community water systems must submit the initial service line inventory to the EPA no later than October 16, 2024. The EPA did not receive a copy of the System’s initial service line inventory by the specified deadline.

This is a violation of the NPDWR. Please take the following actions as soon as possible:

- a. Submit the initial service line inventory to the EPA. 40 C.F.R. §§ 141.90(e)(1).

Instructions on submitting the service line inventory to the EPA can be found on the EPA’s website at <https://www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-and-tribal-lands-epa-region-8>.

- b. Failure to submit an initial service line inventory to the EPA is a reporting violation and requires a Tier 3 PN pursuant to 40 C.F.R. Appendix A to Subpart Q of Part 141. **Within one year of receiving this letter**, distribute a Tier 3 PN for failure to submit an initial service line inventory to the EPA by October 16, 2024, via mail or direct delivery to each customer. You may use the Consumer Confidence Report (CCR) as your Tier 3 PN delivery method if the CCR contains all elements of the Tier 3 PN template and will be delivered prior to the deadline. The Tier 3 PN also can be distributed along with the above Tier 2 PN. 40 C.F.R. § 141.204. Enclosed is the *Tier 2 and Tier 3 PN Template for LCRR* which includes, *Failure to Report Initial Inventory to the State [EPA] – Template 3a*.

- c. Provide the EPA with a copy of your PN and certification within 10 days after issuing the notice, via email at R8DWU@epa.gov, or fax at 303-312-7517. A copy of the PN certification form is located at the bottom of the enclosed *Tier 2 and Tier 3 PN Template for LCRR*.

The EPA Administrator signed the final Lead and Copper Rule Improvements (LCRI) on October 7, 2024, and it was published in the Federal Register on October 30, 2024. The LCRI incorporated select provisions from the 2021 Lead and Copper Rule Revisions (LCRR), including the October 16, 2024 compliance deadline for initial service line inventories. More information on the LCRI requirements can be found on the EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements>.

The System is required to correct the above listed violations and meet the requirements. Ensuring public health protection is our shared goal, so the EPA remains available to provide compliance assistance as you address these important regulatory obligations. No-cost technical assistance may also be available to help with developing a service line inventory.

Violations of the National Primary Drinking Water Regulations may result in a formal enforcement action against your water system. If formal enforcement action were to be necessary, the SDWA provides for civil penalties of up to \$71,545 per day of violation, in accordance with 42 U.S.C. § 300g-3. We prefer to address problems before such formal enforcement is necessary. We ask for your cooperation to resolve these noncompliance problems quickly and effectively.

If you have any questions regarding any of the above, please contact Erica Wenzel, Lead Service Line Coordinator-Wyoming, at wenzel.ERICA@epa.gov, or (303) 312-6411.

Sincerely,

**ANDREA
GUAJARDO**

Digitally signed by
ANDREA GUAJARDO
Date: 2025.03.14
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Ándrea Trujillo Guajardo
Partnerships and Data Section Supervisor
Safe Drinking Water Branch