



# Region 8 Emergency Administrative Orders under Section 1431 of the SDWA

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EPA REGION 8

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# Presentation Overview

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1. EPA's Section 1431 Authority
2. Number of Emergency Orders in Region 8
3. Types of Emergency Orders
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# EPA's Section 1431 Authority

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The EPA may take appropriate enforcement action:

upon receipt of *information* that a contaminant is *in or likely to enter* a public water system which *may present* an *imminent and substantial endangerment* to the health of persons, and the appropriate state and local *authorities have not acted* to protect human health.

# Number of Emergency Orders in Region 8

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	# WY EAOs	# Tribal EAOs	Total
FY2016	6	1	7
FY2017	7	5	12
FY2018	7	7	14
FY2019	6	11	17
FY2020	4	4	8
	30	28	58

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# Types of Emergency Orders

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*“Potential for imminent and substantial endangerment”* to health of people who consume the water.

Such as:

- Loss of pressure (line break, pump failure)
- *E. coli* positive
- Treatment failure (high turbidity)
- Carcasses (dead birds, mice, rats) in finished water storage tank
- Vandalism with potential for contamination
- Chemical contaminants – lead, benzene

# Who We Work With to issue 1431s

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# Emergency Orders - Process

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1. Laboratory, PWS operator, or concerned citizen notifies EPA of situation which could have potential for serious adverse effects on human health.
2. Enforcement Team is notified.
3. EPA contacts PWS, WY DEQ, WY DOH and State epidemiologist.
4. Issue Emergency Administrative Order (EAO). *Usually goes out same day.*
5. E-mail EAO to PWS. May also mail hard-copy to PWS.
6. EPA and PWS are in close contact for duration of emergency to ensure understanding of all Order requirements.

# Key Sections and Requirements

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## ➤ Findings Section

- Details of violation or problem posing imminent and substantial endangerment

## ➤ Order Requirements

- ***Intent to Comply*** within 24 hours of receiving Order
- ***Public Notice*** - Boil Water Advisory, Do Not Drink, or Do Not Use
- ***Alternate Water Supply***
- ***Compliance and Corrective Measures***
  - Repairs
  - Disinfect and flush the System
  - Monitoring requirements (special purpose samples)
  - Plan and schedule if needed
- ***Reporting***



Examples

# Pressure Loss, Small Town

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- Community, GW, 600+ residents
- Main line break caused pressure to drop below 20 psi
- PWS distributed Boil Water Notice. Repaired line break. Disinfected and flushed. Conducted additional monitoring.
- First water emergency for town. EAO provided step-by-step requirements for town leaders and community to address emergency.
- Town sent Thank You to EPA.

# *E. Coli,* Summer Camp

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- Summer camp for youth
- TNC, GW, no treatment, 400 youth per week
- *E. coli* positive routine, repeats and source water samples.
- Boil Water Notice. Provided alternate water for camp season.
- Microscopic particulate analysis (MPA) – not GWUDI
- Built new distribution system. Installed disinfection.
- Emergency Order in coordination with RTCR Level 2 Assessment and GWR Corrective Action Plan.

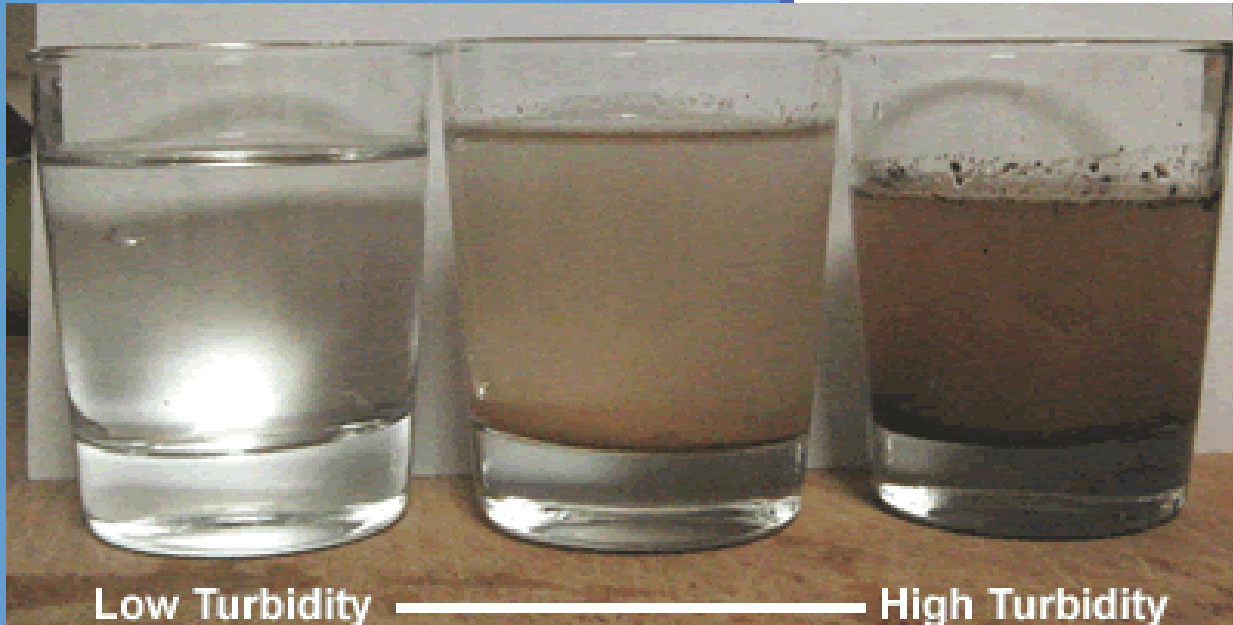
# Dead Rats in Storage Tank, Small Town

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- Community, SW, 500+ people
- Dead rats in a water storage tank discovered during tank cleaning. Tank in poor condition.
- Late reporting to EPA.
- Emergency Order required reinspection of tank. More dead rats found.
- Interim tank repairs. Plan and schedule to build new tank.
- Enforcement compliance inspection.

# High Turbidity, Industrial Facility



- Industrial facility with lunchroom, restrooms and showers
- NTNC, SW, 250 people
- River flooding caused significantly high raw water turbidity (~3000+ NTUs).
- Finished water exceeded maximum turbidity of 5 NTUs.
- High turbidity indicates inadequate treatment and possible failure to remove pathogens.
- Distributed bottled water until raw water turbidity decreased and system could filter.

# Vandalism, Small Town



- Community, SW, 1300 residents
- System vandalized. Destroyed SCADA system, chemical feed components, and dumped unknown substance in clear well.
- On-scene coordinator, FBI and CID responded.
- Emergency Order - Do Not Use. Emergency sampling at plant and school for unidentified chemical/radiological and bacteriological contaminants.
- On-scene coordinator accessed Superfund \$'s for repairs.

# High Lead Levels, Military Base



- Federal facility, Community, consecutive system, SW, 5100 people
- Lead samples 17 ppb – 210 ppb
- Confirmation lead samples 40 ppb
- Exceeded EPA's short-term acceptable risk.
- Emergency Order required public notice, alternate water, additional sampling. Two neighborhoods ID'd with high lead. Pipes treated with epoxy coating.

# Web Resources

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- Drinking Water Systems Operations in Wyoming and on Tribal Lands in EPA Region 8 – <https://www.epa.gov/region8-waterops>
- Addressing Total Coliform Positive or E.coli Positive Sample Results - <https://www.epa.gov/region8-waterops/addressing-total-coliform-positive-or-ecoli-positive-sample-results-epa-region-8>
- Loss of Pressure - <https://www.epa.gov/region8-waterops/loss-pressure-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8>
- Drinking Water E. Coli Contamination Boil Water Advisory - <https://www.epa.gov/region8-waterops/drinking-water-e-coli-contamination-boil-water-advisory-systems-wyoming-and-tribal>



# Questions?

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