



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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FEB 28 2019

Ref: 8WP-SDB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Spencer Hartman
Water and Wastewater Supervisor
Town of Pinedale
P.O. Box 709
Pinedale, Wyoming 82941

Re: Filtration Avoidance Criteria Exceedance and Response Options
PWS ID# WY5600041

Dear Mr. Hartman:

The purpose of this letter is to notify you that the Fremont Lake water source (IN01 and IN02) for the Town of Pinedale public water system no longer meets the filtration avoidance criteria of the Surface Water Treatment Rules (SWTRs) and to provide you with options for responding to this change in status.

According to the monthly operating reports submitted to the U.S. Environmental Protection Agency for the months of August 2018 through January 2019, the Fremont Lake water source met the fecal coliform limit of 20 CFU/100 mL in 80.8% to 84.6% of the compliance samples collected over the rolling six-month period ending in each of these respective months. These results do not meet the requirements of 40 CFR §141.71(a), which requires that fecal coliform samples collected immediately prior to the first or only point of disinfectant application must be equal to or less than 20 CFU/100 mL in at least 90% of the measurements made for the previous six months that the system served water to the public on an ongoing basis.

The EPA is in receipt of the letter sent by the Town of Pinedale via e-mail on January 30, 2019. In this letter, the Town of Pinedale outlines concerns with the validity of the fecal coliform monitoring results that led to Fremont Lake's exceedance of the filtration avoidance criteria outlined above. The EPA has also reviewed this data and has identified many of these same concerns. While the EPA agrees that there is uncertainty in the fecal coliform monitoring results analyzed by the Zedi laboratory in Pinedale, there is no conclusive evidence that fecal coliforms were not present or the filtration avoidance criteria required in regulations were met in the Summer 2018 Fremont Lake compliance samples. In addition, there were elevated total coliform levels during this same time period that were verified by several different laboratories. These total coliform levels were higher than any levels that have been observed in the historical monitoring conducted at Fremont Lake, indicating a bacteriological event in Fremont Lake during the Summer and Fall of 2018 that is unprecedented and may be indicative of changing source water conditions.

The EPA does not believe there is a current public health threat based on the following: 1) Pinedale has two disinfection barriers in place that are being operated effectively, 2) there have been no positive distribution system total coliform samples, 3) there is no indication of *E. coli* contamination at the intake, 4) there is no indication of *Cryptosporidium* or *Giardia* contamination at the intake or in the distributed lake samples, and 5) the turbidity at the intake has continued to remain very low (typically less than 0.2 NTU).

For the reasons discussed above, the EPA is providing the Town of Pinedale with the following three options for responding to this event. **You must notify the EPA indicating which option you have selected within 30 days of receiving this notification.**

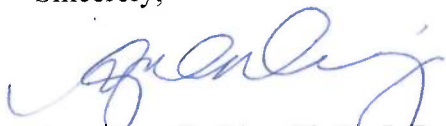
1. **Option 1:** Install filtration equipment on the Fremont Lake water source that complies with the requirements of the SWTRs specified in 40 CFR §141.72(b) and §141.73.
2. **Option 2:** Develop an alternative water source that complies with or is not subject to the requirements of the SWTRs specified in 40 CFR §141.70(b) and disconnect the Fremont Lake intakes from the public water system.
3. **Option 3:** Modify your intake and/or make changes to how the Fremont Lake watershed is being managed to address actual or potential sources of fecal coliforms in the raw water. **If you choose this option, you must provide the EPA with a detailed implementation plan and schedule within 60 days of the date of this notification.** This detailed plan and schedule must include 1) conducting a study of the watershed to identify sources of fecal coliforms at the intakes, 2) determining modifications to mitigate these sources of fecal coliforms along with a detailed schedule for implementation of these modifications, and 3) providing a written description of how any proposed modifications will mitigate the identified sources of fecal coliforms. The initial plan and schedule as well as the documentation developed during plan implementation must be submitted to the EPA for review and approval. Quarterly progress reports, made available to the public, as well as other public notification will also be required. The EPA reserves the right to reject any proposals that do not address sources of fecal coliforms in the raw water or are not consistent with the conclusions of the watershed study.

Routine monitoring indicating compliance with the filtration avoidance fecal coliform limits of the SWTR will be considered evidence that the modifications were successful; however, as described above, the proposed modifications must not involve simply continuing to monitor without making changes to source water collection and/or watershed management. Increased monitoring for total coliforms in the distribution system and for *Cryptosporidium* and *E. Coli* in source water will be required while the watershed study and system modifications are being completed as to provide additional assurances that there are no immediate threats to public health. If Pinedale chooses this option, the EPA will coordinate with the Town of Pinedale to identify specific additional monitoring expectations and reporting. If any ongoing monitoring indicates that bacteriological contaminants are present at levels that present human health risks, the EPA may require a change to these activities, modify the scope of the approved plan and schedule, or require filtration.

In addition to the above, the Town of Pinedale must use a certified laboratory that follows the full requirements of Standard Method SM9222D or SM9221E for all compliance fecal coliform monitoring. This must include verification of any positive colonies following the procedures described in SM9020. See 40 CFR 141.28.

If you have any questions about the options discussed above or the Surface Water Treatment Rules, please contact Jake Crosby at (303) 312-6389, or by email at crosby.jake@epa.gov.

Sincerely,



Angelique D. Diaz, Ph.D., P.E.
Unit Manager, Drinking Water Unit B
Office of Water Protection

