



PROTECT OUR WATER
JACKSON HOLE

Transmitted via email

September 16, 2020

Jodie Pond
Director of Health
Teton County Health Department
460 East Pearl Avenue
PO Box 937
Jackson, Wyoming 83001

Ted VanHolland
Teton County Sanitarian
320 South King Street
Jackson, WY 83001

Kevin Frederick, Administrator
Department of Environmental Quality,
Water Quality Division
200 W 17th Street
Cheyenne, WY 82001

Re: Request for Investigation of Elevated Nitrate Levels at the Snake River Mobile Home Park, Public Water System No. WY5600214

Dear Ms. Pond, Messrs. VanHolland and Frederick:

We are writing to express our concerns about elevated nitrate concentrations in drinking water serving the residents of the Snake River Mobil Home Park (SRMHP). Consumer confidence reports (CCR) for the public water system (PWS) operated by the SRMHP show that nitrate levels have been trending upwards for the past decade and are now perilously close to reaching the U.S. Environmental Protection Agency's maximum contaminant level of 10 milligrams per liter (mg/L). Under federal regulations implementing the Safe Drinking Water Act, a determination that the MCL for nitrate has been exceeded will compel regulatory action by EPA.¹ We believe it would be beneficial to avoid that scenario,

¹ See 40 CFR Part 141 and Part 142—regulations for the implementation and enforcement of the national primary drinking water program. A concise summary of the Safe Drinking Water Act is available online at: <https://www.epa.gov/sites/production/files/2015-04/documents/epa816f04030.pdf>.

and therefore request prompt action by your departments to determine –and address– the cause of rising nitrate levels in the drinking water provided by this facility.

The attached CCR for the SRMHP’s public water system shows that nitrate concentrations in 2019 ranged from 3.32 - 11.2 mg/L. The higher value exceeds the EPA’s maximum contaminant level of 10 mg/L.² According to the CCRs available on the EPA Region 8 Drinking Water Watch website, nitrate concentrations in drinking water provided by the SRMHP have been steadily increasing during the past decade, as follows:

2019	9 mg/L
2018	7 mg/L
2017	6 mg/L
2016	7 mg/L
2015	4 mg/L
2014	1 mg/L
2013	1 mg/L
2012	1 mg/L
2011	2 mg/L
2010	0.72 mg/L
2009	1 mg/L

Given this upward trend in nitrate levels, we believe it would be advisable to inspect the public water system, along with the wellhead(s), and source water areas Zones 1 and 2, for potential health and sanitary code violations and/or obvious sources of nitrate that may be contributing to the concerning increase in nitrate levels. While sources of nitrates vary, in this instance obvious and potentially significant sources include five wastewater disposal facilities on the premises permitted by the County Sanitarian: SWF2001-0105; SWF2001-0096; SWF1997-0001; SWF1980-0563; and SWF1980-0562.

It should also be noted that the 2019 CCR displays violations of the Safe Drinking Water Act that include a failure to provide an annual report to water consumers describing the quality of the drinking water and a failure to test the drinking water provided by this PWS for nitrates from 04/01/2019 to 06/30/2019. The EPA’s Detailed Facility Report for the SNMHP displays “Significant/Category 1 Noncompliance” issues, including significant violations reported in 8 of the last 12 quarters. *See* EPA Enforcement and Compliance History Online (ECHO) database at: <https://echo.epa.gov/detailed-facility-report?fid=110058916794>.

Finally, we believe it is important to notify the residents of the SRMHP that nitrate concentrations at the levels shown above present potential health risks to the consumers.

Thank you in advance for your prompt attention to this matter.

² This single reading of 11.2 mg/L did not trigger regulatory action by EPA because a sample taken in October, 2019 showed a nitrate concentration of 8.9 mg/L. Personal communication with Kyle St. Claire, Nitrate Rule Manager, U.S. EPA Region 8.

Sincerely,



Dan Heilig
Senior Conservation Advocate
Wyoming Outdoor Council



Dan Leemon
Executive Director
Protect Our Water Jackson Hole

Cc: Teton County Board of County Commissioners

Enclosure: 2019 CCR for Snake River Mobile Home Park, PWS No. WY5600214