



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8EPR-ER

ACTION MEMORANDUM

SUBJECT: Approval and Funding for a Removal Action at the Star Valley Drinking Water Site in Grover, Lincoln County, Wyoming pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

FROM: Martin McComb
Federal On-Scene Coordinator

THRU: Kerry Guy, Supervisor
Response Section

Dee Rothery, Manager
Emergency Management Branch

TO: Betsy Smidinger, Director
Superfund and Emergency Management Division

Site ID# B8D9

I. PURPOSE

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Star Valley Drinking Water Site located in Grover, Lincoln County], Wyoming pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104. This emergency removal action involved assisting the operator of a community water system that had been intentionally contaminated with an unknown oily substance. Conditions existing at the Site present a threat to public health or welfare or the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the National Contingency Plan (NCP).

This removal action involves no nationally-significant or precedent-setting issues. This time-critical removal action will not establish any precedent for how future response actions will be taken and will not commit the US Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future responses or resources.

II. SITE CONDITIONS AND BACKGROUND

Site Name:	Star Valley Drinking Water
Superfund Site ID (SSID):	B8D9
NRC Case Number:	
CERCLIS Number:	WYN000821187
Site Location:	Grover, Lincoln County, Wyoming
Lat/Long:	42.81165587291755 /-110.9486531553022
Potentially Responsible Party (PRP):	
NPL Status:	Non NPL
Removal Start Date:	08/05/2022

A. Site Description

1. Removal Site Evaluation

On August 5, 2022, EPA received a report from the National Response Center (NRC) regarding an incident at the Star Valley Trailer Court, north of Grover, Wyoming. The NRC report stated an individual who lives at the trailer court deliberately injected an unknown oily substance into the drinking water distribution system. The trailer court gets its drinking water from an artesian groundwater well and has approximately 32 connections, serving a population of roughly 72 persons. The well was not contaminated but six homes were reported to have been impacted. The drinking water owner/operator shut down the system, notified all residents and quickly installed two valves to isolate the contaminated homes.

The EPA has primary authority to enforce the public water supply protection program in Wyoming and issued the system operator an administrative order to provide alternative drinking water to the residents and to conduct flushing and specified sampling of the system. EPA dispatched an emergency response team to assist the system operator with flushing the distribution system and taking water samples.

The EPA response resources arrived at the Site on August 6, 2022, and formed a Response Team with the system operator and property owner. Residents in the impacted homes reported an oily substance in their taps, being covered in the substance while taking showers and laundry that had been covered in oil after wash cycles. Oily residue was visible in toilet bowls, sinks and on the ground near several outdoor taps at these homes. No residents outside the six impacted homes reported any issues.

2. Physical Location

The Star Valley Trailer Court is located in Grover, Lincoln County, Wyoming. The trailer park is located along Highway 89 just north of Grover between Afton

and Alpine. Approximately 72 residents reside in modular housing at the trailer court.

3. Site Characteristics

The Site is privately owned and was recently purchased by a new owner in April 2022. The owner has been making investments in the property and at least a few individuals are unhappy with the changes and development.

4. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant, or Contaminant

The incident is being investigated by law enforcement and evidence of the deliberate injection of an unknown substance into the community water system was removed before the EPA's response team arrived. While the material injected is unknown, the presence of an oily substance and sheen in the water system led the On-Scene Coordinator to conclude that the substance was a pollutant or contaminant and potentially a CERCLA hazardous substance involving spent motor oil perhaps from heavy equipment.

5. NPL Status

This Site is neither on nor currently being considered for inclusion on the NPL.

6. Maps, Pictures, Other Geographic Representations

Relevant photos are available as an Attachment to this document.

B. Other Actions to Date

1. Previous Actions

The EPA's Water Enforcement Branch issued an administrative order to the owner and operator of the Star Valley Trailer Court Public Water System. The order required the owner to distribute a "Do Not Use" public notice and provide an alternative potable water supply. The Order also required the flushing and testing of the water lines.

The drinking water owner/operator shut down the system, notified all residents and quickly installed two valves to isolate the contaminated homes.

2. Current Actions

Post flushing samples received by EPA on August 26, 2022, showed no remaining concerns. As a result, the EPA Drinking Water Program notified the

owner/operator that it was lifting its order and the system could be put back into normal operation.

C. State and Local Authorities' Role

1. State and Local Actions to date

Local authorities' actions centered around law enforcement actions only, and do not contribute to the Site cleanup.

2. Potential for Continued State/Local Response

State and local entities do not have the resources or authority to conduct this removal action and are involved in a consultation role only.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the Site present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the NCP.

EPA has considered all the factors described in 40 CFR 300.415(b)(2) of the NCP and determined that the following factors apply at the Site.

“(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants or contaminants:”

Without access to a safe water source, residents of the Star Valley Trailer Court do not have potable water, or water to shower, wash dishes, or laundry clothes. Several residents with children were temporarily relocated by the local Red Cross and church groups.

“(viii) The availability of other appropriate federal or state mechanisms to respond to the release:”

Local and state governments do not have the capability to conduct the action in a timely manner.

IV. ENDANGERMENT DETERMINATION

The malicious injection of a pollutant or contaminant and potentially a CERCLA hazardous substance into the Star Valley Trailer Court Public Water System presents an imminent and substantial endangerment to public health.

V. SELECTED REMOVAL ACTION AND ESTIMATED COSTS

A. Removal Actions

1. Action Description

Legal access was obtained from the owner of the trailer court for all outdoor areas, a majority of the unimpacted owners, and five of the six impacted homeowners. The owner of the sixth home is the individual who reportedly put the material in the system and did not respond. This sixth impacted home was completely disconnected from the water distribution system on August 6, 2022, so that flushing of the system could proceed. Portable toilets and hand wash stations were set up in the trailer court.

Flushing involved systematically opening all the hot and cold water taps at each property moving away from the well house. The homes in the unimpacted zone were flushed on August 6, 2022. No visible sheen, oily substances nor odors were encountered during this process.

The Response Team flushed the 5 impacted homes on August 7, 2022. This process started by cutting the main line behind the isolation valve that was installed just west of the last impacted home. This segment of the main line was drained to install a water collection bib next to the isolation valve. When the main was cut, approximately 15 gallons of water mixed with a heavy oily substance was released. This material was collected and sampled. The main line was then pressurized and flushed for 15 minutes. Little to no visibly contaminated water was generated.

The Team flushed the main in this isolated segment again for 15 minutes before opening the isolation valve and reversing the flow in the main so that the water ran from the well, through the unimpacted segment and finally through the impacted segment. The entire main was flushed again under this configuration for approximately 30 minutes with no visual signs of contamination.

The septic tanks servicing the impacted homes were pumped out. The collection of confirmation samples began on August 7th and the system operator collected the final bacteria samples on August 8th. Data results are expected by August 26th.

2. Contribution to Remedial Performance

This effort will, to the extent practical, contribute to the EPA Drinking Water Program's effort to bring the water system back on-line.

3. Engineering Evaluation/Cost Analysis (EE/CA)

An EE/CA is not required for an emergency removal action.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

No ARARs were identified at the time of this emergency removal action.

5. Project Schedule

This emergency removal action started on August 5, 2022 and ended on August 8, 2022.

B. Estimated Costs*

	Estimated Costs
ERRS contractor	\$ 125,000
START contractor	\$ 75,000
SUBTOTAL	\$ 200,000
Contingency costs (20% of subtotal)	\$ 40,000
Total Removal Project Ceiling	\$ 240,000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would have increased the actual threat to public health.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

An investigation to evaluate potential enforcement options will be undertaken. A separate Enforcement Addendum will be prepared if appropriate providing a confidential summary of potential enforcement activities.

IX. APPROVALS

This decision document represents the selected removal action for the Star Valley Drinking Water Site in Grover, Lincoln County, Wyoming, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b)(2) criteria for a removal action, and through this document, I am approving the proposed removal action. The total project ceiling will be \$240,000; this amount will be funded from the Regional removal allowance.

Martin McComb
On-Scene Coordinator
EPA Region 8

Date

Attachment: Photo Log

Star Valley Drinking Water Incident

Photo Log

Description: Artesian well house that serves as the community water source. Note temporary water tank placed in front of the building by property owner to supply residents with non-potable water.

Category: 01 Aug 6-7

Latitude: 42.8116009166667

Date Taken: 8/6/2022

Longitude: -110.94878525

Tags:



Description: Looking west towards front of trailer park. EPA's Response Team brought three sets of temporary toilets / hand washing stations and shared them with residents.

Category: 01 Aug 6-7

Latitude: 42.8117055416667

Date Taken: 8/6/2022

Longitude: -110.951689016667

Tags:



Description: Looking west towards front of trailer park. In the foreground, containment being rolled out for installation beneath the Response Teams frac tanks.

Category: 01 Aug 6-7

Latitude: 42.8116840555556

Date Taken: 8/6/2022

Longitude: -110.9508985

Tags:



Description: Looking west from the well house.

Category: 01 Aug 6-7

Latitude: 42.811753

Date Taken: 8/6/2022

Longitude: -110.948703944444

Tags:



Star Valley Drinking Water Incident

Photo Log

Description: Control valve in water distribution system piping installed by the operator at lot 7 to isolate the contaminated homes.

Category: 01 Aug 6-7

Latitude: 42.8119926666667

Date Taken: 8/6/2022

Longitude: -110.950204804722

Tags:



Description: Control valve in water distribution system piping installed by the operator at lot 1 to isolate the contaminated homes.

Category: 01 Aug 6-7

Latitude: 42.8117626944444

Date Taken: 8/6/2022

Longitude: -110.948570472222

Tags:



Description: Looking west as frac tank staging is in progress.

Category: 01 Aug 6-7

Latitude: 42.8117353333333

Date Taken: 8/6/2022

Longitude: -110.94928075

Tags:



Description: Frac tank staging area near well house. The community's artesian well does not appear to be impacted.

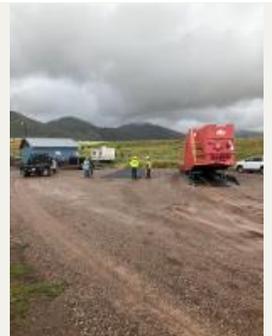
Category: 01 Aug 6-7

Latitude: 42.8117673333333

Date Taken: 8/6/2022

Longitude: -110.949186638889

Tags:



Star Valley Drinking Water Incident

Photo Log

Description: Observing water conditions EPA's Team work to flush the water line in a trailer.

Category: 01 Aug 6-7

Latitude: 42.8120711666667

Date Taken: 8/6/2022

Longitude: -110.951805491667

Tags:



Description: Stained area surrounding water hose caused by the oily substance of concern.

Category: 01 Aug 6-7

Latitude: 42.8118701111111

Date Taken: 8/7/2022

Longitude: -110.949868861111

Tags:



Description: Oily substance of concern observed in a toilet.

Category: 01 Aug 6-7

Latitude: 42.8122229583333

Date Taken: 8/7/2022

Longitude: -110.949316833333

Tags:



Description: Oily substance of concern stained inside of a washing machine.

Category: 01 Aug 6-7

Latitude: 42.8119907222222

Date Taken: 8/7/2022

Longitude: -110.949139583333

Tags:



Description: Control valve located at lot 7 is cut to add connection for flushing into a frak tank.

Category: 01 Aug 6-7

Latitude: 42.8120560555556

Date Taken: 8/7/2022

Longitude: -110.950252366111

Tags:



Star Valley Drinking Water Incident

Photo Log

Description: Installed connection at the control valve located at lot 7 for flushing into frak tank.

Category: 01 Aug 6-7

Latitude: 42.8120166111111

Date Taken: 8/7/2022

Longitude: -110.9502158075

Tags:



Description: Absorbent pads used to collect the oily substance of concern from water collected under the control valve located at lot 7.

Category: 01 Aug 6-7

Latitude: 42.8121330277778

Date Taken: 8/7/2022

Longitude: -110.950258468056

Tags:



Description: Oily substance of concern that was collected from near the control valve located at lot 7.

Category: 01 Aug 6-7

Latitude: 42.8120378888889

Date Taken: 8/7/2022

Longitude: -110.950222047222

Tags:



Description: Oily substance of concern that was collected from near the control valve located at lot 7.

Category: 01 Aug 6-7

Latitude: 42.8120081666667

Date Taken: 8/7/2022

Longitude: -110.950230853333

Tags:



Star Valley Drinking Water Incident

Photo Log

Description: Star Valley Court facing west.

Category: 01 Aug 6-7

Latitude: 42.8117524166667

Date Taken: 8/7/2022

Longitude: -110.949691583333

Tags:



Description: First 4 trailers that were effected by the oily substance of concern. Facing east.

Category: 01 Aug 6-7

Latitude: 42.8117533888889

Date Taken: 8/7/2022

Longitude: -110.949681555556

Tags:



Description: Pump house (small building on the left and lot 28, where START was staged for sample processing. Taken from atop frak tank and facing southeast.

Category: 01 Aug 6-7

Latitude: 42.8117558333333

Date Taken: 8/7/2022

Longitude: -110.949683083333

Tags:



Description: Frak tank being used to collect flushed water from main water line.

Category: 01 Aug 6-7

Latitude: 42.8116944722222

Date Taken: 8/7/2022

Longitude: -110.949774111111

Tags:



Star Valley Drinking Water Incident

Photo Log

Description: Disconnecting water lines connected to a washing machine inside of trailers during water line flushing process.

Category: 01 Aug 6-7

Latitude: 42.8120042222222

Date Taken: 8/7/2022

Longitude: -110.949378611111

Tags:



Description: Flushing a shower inside a trailer.

Category: 01 Aug 6-7

Latitude: 42.8119722638889

Date Taken: 8/7/2022

Longitude: -110.949535388889

Tags:



Description: Monitoring water for contamination during the flushing of an external water tap.

Category: 01 Aug 6-7

Latitude: 42.8120221111111

Date Taken: 8/7/2022

Longitude: -110.949442138889

Tags:

