

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, CA 94105-3901**

IN THE MATTER OF:)	Docket No. PWS-AO-2025-002
)	
Havasu Water Company,)	
Jennifer Hodges,)	
Public Water System, PWS ID. No. 090600202)	
)	EMERGENCY ADMINISTRATIVE ORDER
Respondent.)	
)	
Proceedings pursuant to Section 1431(a) of the)	
Safe Drinking Water Act, 42 U.S.C. § 300i(a).)	
_____)	

AUTHORITY

1. The Enforcement and Compliance Assurance Division for Region 9 of the U.S. Environmental Protection Agency (EPA) issues this Emergency Administrative Order (“Order”) to Jennifer Hodges (“Respondent”), owner of the Havasu Water Company public water system (“System”) pursuant to EPA’s authority under Section 1431(a) of the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300i(a). The undersigned officials have been properly delegated this authority.
2. EPA has primary enforcement responsibility for the SDWA public water system supervision program in Indian Country in California, including the Chemehuevi Indian Reservation (“Reservation”). The State of California, acting through its California State Water Resources Control Board Division of Drinking Water (DDW), previously asserted primary enforcement responsibility over the System under Section 1413(a) of the SDWA, 42 U.S.C. § 300g-2(a). However, it was determined that the System was located within the exterior boundaries of the Chemehuevi Indian Reservation and was therefore within EPA’s jurisdiction. On January 1, 2024, DDW officially transferred oversight of the System to EPA.
3. EPA may issue an Order pursuant to Section 1431(a) of the SDWA, 42 U.S.C. § 300i(a), when a contaminant is present or is likely to enter a public water system, which may present an imminent and substantial endangerment to the health of persons, and appropriate state and local authorities have not acted to protect the health of such persons.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

4. Respondent, Jennifer Hodges (doing business as Havasu Water Company), is an individual and therefore is a “person” as that term is defined in the Act. 42 U.S.C. § 300f(12), and 40 C.F.R. § 141.2.
5. Respondent owns and/or operates a “public water system” (PWS) within the meaning of Section 1401(4) of the SDWA, 42 U.S.C. § 300f(4), and 40 C.F.R. § 141.2, known as the Havasu Water Company public water system, which serves drinking water for human consumption through approximately 221 service connections to approximately 361 persons located on the Reservation at 148896 Havasu Lake Road, Needles, CA 92363.
6. Respondent’s ownership and/or operation of a PWS makes them a “supplier of water” within the meaning of Section 1401(5) of the SDWA, 42 U.S.C. § 300f(5), and 40 C.F.R. § 141.2, and subject to the requirements of Part B of the SDWA, 42 U.S.C. § 300g, and its implementing regulations at 40 C.F.R. Part 141.
7. The System regularly serves at least twenty-five (25) year-round residents and is therefore a “community water system” (CWS) within the meaning of Section 1401(15) of the SDWA, 42 U.S.C. § 300f(15), and 40 C.F.R. § 141.2.
8. The System is supplied by a surface water source accessed through an intake in Lake Havasu and uses a chemical disinfectant (chlorine) to treat the raw water.
9. The SDWA's Stage 1 Disinfection Byproducts Rule (DBPR) at 40 C.F.R. § 141.130(c) requires, among other things, that any CWS that adds a chemical disinfectant (e.g., chlorine) to the water in any part of the drinking water treatment process must be operated by “qualified” personnel who meet the requirements specified by the State (or the EPA where it is the primacy agency). Similarly, the Surface Water Treatment Rule (SWTR) at 40 C.F.R. § 141.70(c) requires that any CWS supplied by a surface water source be operated by qualified personnel.
10. Since March 2022, the System has had many water distribution line breaks, water outages, and pressure loss incidents, as described below. California’s DDW provided information about incidents prior to January 1, 2024. DDW was notified of at least five water outages from March 2022 and December 2023. Since EPA assumed regulatory oversight of HWC on

January 1, 2024, EPA has been notified of five water outages. The ten reported water outages since March 2022 were due to the following reasons: five were caused by water line breaks within the distribution system, two were caused by power outages, and three were due to lack of a certified operator to appropriately operate the system.

11. During four of these water outage incidents, the System did not issue a Boil Water Notice (BWN) even though there was a loss of pressure in the system. Despite clear direction from EPA, Respondent failed to issue a timely BWN to all customers on both occasions where EPA explicitly required it. In several instances, the Respondent has distributed misinformation to customers with language that nullified the purpose of the required notice and by physically covering a BWN posted in a public place with a letter with misinformation, despite EPA providing a template and direction for the issuance of BWN's.
12. Due to lack of a certified treatment operator, DDW required Respondent to issue a BWN from October 31, 2023 until November 21, 2023 due to Respondent's failure to submit monthly operating reports from June 2023 through September 2023 that could demonstrate the surface water treatment plant was operating properly. EPA also required Respondent to issue a BWN from February 8, 2024, until April 26, 2024 as EPA was unable to verify the water was safe to drink due to incomplete and unreliable surface water treatment data.
13. Since March 2022, the System has been under a BWN for approximately 300 days due to water outages or failure to submit sufficient surface water treatment data to demonstrate the System was serving safe drinking water.
14. The System's D1 certified distribution operator does not regularly conduct onsite visits to adequately operate the distribution system. The System did not have a record of any onsite work by the distribution operator. The distribution operator only provides remote assistance when onsite personnel call for guidance. Line breaks repairs are conducted without onsite direction of a certified distribution operator and have been conducted without proper permitting and safety standards.
15. The System's distribution system is not properly operated. The System has a history of water outages due to: frequent line breaks, inadequate knowledge of the distribution system's layout (i.e., valve and pipe locations), poorly maintained valves, flushing of the distribution system conducted and overseen by noncertified individuals, no consistent

source of back-up power during power outage events, and no certified distribution operator appropriately maintaining the distribution system infrastructure.

16. The System's treatment system is not properly operated. The System has not had consistent staffing of a certified T2 operator over several years to conduct essential onsite treatment operations. Respondent has provided information indicating that water treatment processes for the surface water system are regularly conducted by individuals without certification, including water treatment. In addition, operational decisions such as determining when to turn on the system to treat water and actions taken to manage elevated disinfectant byproducts are made by individuals without proper certification.
17. The System has no standard operating procedures for pressure loss or emergency response plans in place. The lack of an emergency response plan was identified as a significant deficiency during a sanitary survey conducted at the System on May 8, 2024. EPA found that the lack of a defined emergency response plan, especially in light of the frequent loss of pressure incidents and water line breaks, has the potential to cause the introduction of contaminants into the water delivered to customers.
18. Prior to issuing this Order, EPA confirmed that tribal and local authorities have not acted to protect the health of persons in this instance. During the State's tenure regulating the System, the State initiated enforcement against the System but the SDWA violations and conditions causing risk to public health have persisted. EPA has primary enforcement authority of SDWA over the System due to its location within the exterior boundaries of the Reservation.
19. EPA has determined that the following conditions at the System may present an imminent and substantial endangerment to the health of persons, and that this Order is necessary to protect public health.

Loss of Pressure in Drinking Water Distribution System

20. The System has had broken water lines at least four times since June 2024, resulting in a water outage and subsequent loss of pressure in the System. Due to problems in the distribution system, including a lack of knowledge of where isolation valves are located, pressure loss due to line breaks are likely to occur in the future. Additional, power outages may result in loss of pressure if there is no back-up power available to keep the System's

treatment plant and pumps running.

21. A loss of pressure in a drinking water distribution system may cause a net movement of water from outside of a pipe to the inside through cracks, breaks, or joints in the drinking water distribution system that are common in all water systems. Back siphonage is also a condition resulting from low or no pressure. Such system failures, coupled with the fact that there is no cross-connection control device, carry a high potential for fecal contamination or other disease-causing organisms to enter a drinking water distribution system.

Use of Unqualified Personnel to Operate the System

22. Respondent has provided information that indicates that the System has been operated by non-certified individuals who do not meet the requirement to be “qualified personnel” to operate the system with at least Treatment Level 2/Distribution Level 1 (T2/DI certification) to operate the System as required by the DBPR at 40 C.F.R. § 141.130(c) and the SWTR at 40 C.F.R. § 141.70(c). Failure to use a “qualified” operator creates conditions that may pose an imminent and substantial endangerment to the health of persons. The EPA has found that unqualified and inadequately trained and certified operators, particularly at small systems, may lack adequate knowledge of operations and maintenance of drinking water treatment systems, and may not be aware of the latest drinking water requirements. See generally U.S. EPA, *Final Guidelines for the Certification and Recertification of the Operators of Community and Nontransient Noncommunity Public Water Systems*, 64 Fed. Reg 5916, 5918 (Feb. 5, 1999).

EMERGENCY ORDER

Intent to Comply

23. Within twenty-four (24) hours of the Order’s effective date, Respondent must notify EPA Points of Contact in writing of their intent to comply with the terms of this Order. To satisfy this requirement, Respondent must email the EPA Points of Contact as identified below in Paragraph 24.
24. All responses, submittals, and/or other correspondences must be submitted via email to the EPA staff (Points of Contact) identified below. The EPA Points of Contact may designate an alternative or additional point of contact via email at any time.

Christopher Chen
SDWA Enforcement Section
U.S. Environmental Protection Agency
600 Wilshire Blvd, Suite 940 (ENF-3-3)
Los Angeles, CA 90017
Phone: (213) 244-1853
E-mail: chen.christopher@epa.gov

Annie Wan
Tribal Drinking Water Team
U.S. Environmental Protection Agency
75 Hawthorne Street (WTR-4)
San Francisco, CA 94105
Phone: (415) 972-3845
Email: wan.annie@epa.gov

Water Outages Responses and Boil Water Notices

25. Whenever the System has a full or partial system water outage, within twenty-four (24) hours, but as soon as possible after learning of the water outage, Respondent must issue a BWN using the template attached as Appendix A and notify EPA Points of Contact of the water outage. The System must also issue a BWN when directed by EPA. The BWN must be distributed in the format specified in Appendix A, and the only language that may be changed are the dates highlighted in yellow. Any further alterations to the BWN language are not permitted without prior EPA approval. The BWN must be issued to all users of the System and must remain in place until EPA provides written notification to Respondent that the BWN is no longer needed. Respondent must issue the BWN by, at minimum, delivering or posting the BWN on the front door of every residence and/or building served by HWC.
26. Respondent must carry out the public notice and other notice requirements as required by 40 C.F.R. part 141, subpart Q.
27. For full system outages, Respondent must collect total coliform bacteria samples at all EPA-approved sample sites in the system after pressure is restored. For partial system outages,

Respondent must collect at minimum two total coliform bacteria samples from the affected area of the water outage after pressure is restored. All samples testing “positive” or “present” for total coliform bacteria must also be analyzed for the presence of *E. coli*. Respondent must conduct the monitoring in accordance with National Primary Drinking Water Regulations, including but not limited to 40 C.F.R. § 141.31 and 40 C.F.R. § 141.405, use a certified laboratory, and send the analytical results via email to EPA Points of Contact within twenty-four (24) hours of receiving the results.

28. Respondent must comply with any additional and/or more frequent drinking water sampling and analysis requirements determined necessary by EPA following written notice by EPA of any such requirements.
29. Once EPA has received a satisfactory number of negative total coliform bacteria samples, EPA will provide written notification to Respondent that the boil water notice is no longer in effect and may be lifted.
30. Any repairs to a water main, such as due to a line break, must be completed by a licensed contractor, with all required permits. Any repaired water mains must be disinfected in accordance with American Water Works Association (AWWA) Standard C651. Any excavation work conducted to complete water main repairs or to assess the distribution system must be completed in accordance with San Bernardino County Code.

Emergency Standard Operating Procedures for Pressure Loss

31. Within thirty (30) days of the Order’s effective date, Respondent must develop and submit to the EPA Points of Contact for review and approval a Standard Operating Procedure (SOP) for responding to emergency pressure loss incidents at the System. The SOP, at minimum, must include detailed, exact steps for the following:
 - a. How the System will identify the cause and location of the pressure loss;
 - b. How the System will ensure appropriate and timely notification of all residents with the EPA-approved Boil Water Notice;
 - c. Steps the System will take to conduct a line break repair that has caused pressure loss, if applicable. This section must also include information about licensed contractors who can respond in a timely manner and plans for required personnel to be onsite (including the certified distribution operator);

- d. Steps the System will take to respond to a power outage that has caused pressure loss, if applicable. This section must also include plans for required personnel to be onsite (including the certified distribution operator and any required equipment);
 - e. How the System will implement disinfection procedures in accordance with AWWA Standard C651; and
 - f. When and how the System will collect the appropriate total coliform samples to demonstrate the System does not have the presence of acute contaminants.
32. If EPA disapproves the SOP, Respondent has seven (7) days to revise and resubmit the SOP to address any deficiencies identified by EPA. Once the SOP is approved by EPA in writing, Respondent must implement the SOP to ensure emergency pressure loss situations are appropriately addressed.

Alternative Water

33. Whenever the System is aware of a water outage or subject to a Boil Water Notice, Respondent must immediately make available an alternative source of water (e.g., bottled water) to all users of the System.
34. Within seven (7) days of the Order's effective date, Respondent must develop and submit to EPA Points of Contact for review and approval an Alternative Water Source Plan (AWSP). In the AWSP, Respondent must detail how and where they will make available at least one gallon of potable water per day, per person whenever there is a boil water notice in effect. This per person daily allotment of alternative water must be made accessible to all persons served by the System immediately following a water outage. Additionally, the AWSP must outline how Respondent plans to inform every person served by the Water System when and where the alternative water source will be made available. If bottled water is going to be used by Respondent as the alternative water in accordance with this Order, Respondent must ensure that the bottled water is certified by the International Bottled Water Association or the National Science Foundation International.
35. Any alternative source of water must meet all applicable SDWA requirements at 40 C.F.R. Part 141. Respondent must provide the alternative source of water to the impacted public at no direct or indirect cost (e.g., by raising rent, raising water rates or collecting fees) to the impacted public.

36. If EPA disapproves the AWSP, Respondent has twenty-four (24) hours to revise and resubmit the AWSP to address any deficiencies identified by EPA. Once the AWSP is approved by EPA in writing, Respondent must implement the AWSP to ensure alternative water is available to residents whenever a boil water notice is in effect. The requirement to provide bottled water according to the AWSP will remain in effect until EPA provides written notification to Respondent that AWSP implementation is no longer required.
37. If the System has had a water outage and/or is under a Boil Water Notice without an EPA-approved AWSP in place, the System must make bottled water available to each user one gallon of potable water per day, per person, immediately after becoming aware of the water outage and/or Boil Water Notice requirement, but no later than 12 hours after becoming aware. This per person daily allotment of alternative water must be made accessible at a central location to all persons served by the System (i.e., System's office, community center). This central location must be available for users to retrieve alternative water from 9:00am – 5:00pm every day until the Boil Water Notice has been lifted by EPA. Respondent must ensure that the bottled water is certified by the International Bottled Water Association or the National Science Foundation International.

Assessment and Corrective Action of Drinking Water Distribution System

38. In order for the System to effectively repair water main breaks and appropriately operate and maintain the distribution system, an updated, accurate, detailed map of the distribution system is needed that identifies actual locations of pipes, valves, service line connections, and other appurtenances to the extent possible. In addition, a professional assessment of the state of maintenance and repairs to the distribution system is needed. To ensure appropriate development of this map and assessment, Respondent must:
- a. Identify Technical Provider for Approval: Within fourteen (14) days of the Order's effective date, Respondent must identify and request EPA's approval to retain one or more properly certified, third-party technical provider(s) with sufficient technical and/or engineering knowledge and experience in drinking water operations and design to develop an updated system map and conduct a maintenance assessment. Respondent must request approval of the technical provider(s) via email to EPA Points of Contact.

- b. Retain Technical Provider Approved by EPA: Upon EPA's approval of the technical provider(s), Respondent has forty-eight (48) hours to retain the technical provider(s).
- c. Submit Work Plan: Within fourteen (14) days of EPA's approval of the technical provider(s), Respondent must develop and submit a written work plan ("Work Plan") to EPA Points of Contact for review and approval, which must include: (1) a schedule by which the technical provider(s) will generate a technical assessment report ("Technical Report") of the System on the topics identified below, and (2) a description of the processes and/or procedures created by the technical provider(s) that will be used to conduct the technical assessment.

Required elements of Technical Assessment:

- i. Develop a current infrastructure design layout for the drinking water distribution system pipes, valves, and other appurtenances;
 - ii. Precise locations of pipes, valves, and other appurtenances to the extent possible;
 - iii. Identify any and all deficiencies in the distribution system and elements of the system in need of repair and/or maintenance and provide recommended solutions to remedy those deficiencies; and
 - iv. Identify estimated timeline for completion of elements of Technical Assessment.
- d. Seek EPA Approval and Implement Work Plan: Upon approval by EPA, Respondent must implement the Work Plan in accordance with the schedule set forth therein. If EPA disapproves of the Work Plan, Respondent must submit a revised Work Plan within five (5) days of receipt of EPA's disapproval, and Respondent must incorporate into the revised Work Plan any change required by EPA or address any deficiencies to the plan identified by EPA.
 - e. Submit Technical Report: Within seven (7) days of the completion of the Technical Report, Respondent must submit the Technical Report as identified in Paragraph 39 to EPA Points of Contact.
 - f. Implementation of Technical Report: After EPA has reviewed the Technical

Report, EPA will identify which deficiencies require immediate attention by Respondent and communicate these via email or a virtual meeting. Within fourteen days (14) of EPA's identification of the deficiencies requiring corrective action, Respondent must retain a qualified and licensed contractor to conduct the work EPA has identified as necessary to correct the deficiencies within the timeframes as determined by EPA.

Operator Duties

39. The certified distribution operator, who must hold a D1 certification at minimum, must be physically on-site to review, operate, and maintain the system a minimum of once per month. The certified operator must be present for any scheduled maintenance activities, including, but not limited to, flushing of the distribution system, line repairs/replacements, valve repairs/replacement, meter installations, ensuring other personnel are executing work properly, and routine tank and pump inspections. Whenever the System has a line break, the certified distribution operator must be present to oversee any repairs. Monthly distribution operator logs, maintained only by the certified distribution operator, must describe any work the certified distribution operator conducted, including dates the work occurred. These operator logs must be emailed to the EPA Points of Contact every month no later than 10 days after the previous month passed (for example, the November 2024 operator log would be due by December 10, 2024).
40. The certified treatment operator, who must hold a T2 certification at minimum, must: be physically on-site to make operational decisions whenever the System is making water and/or when the treatment plant is actively treating the water, be the only authorized individual to physically operate and maintain chlorine dosage, and complete the monthly operating report as required by the SWTR. Monthly treatment operator logs, maintained only by the certified treatment operator, must describe any work the certified treatment operator conducted, including dates the work occurred. These treatment operator logs must be emailed to the EPA Points of Contact every month no later than 10 days after the previous month passed (for example, the November 2024 operator log would be due by December 10, 2024).

Reporting

41. Respondent must submit to EPA Points of Contact written updates on a monthly basis by

the last day of each month that describe Respondent's progress on complying with this Order. Respondent must use the monthly progress report template as specified in Appendix B. At a minimum, the update must include description of all activities Respondent has taken to identify and address the problems with the distribution system and a summary of all efforts to meet the requirements of this Order including the provision of alternative water, details regarding loss of pressure incidents including information on repairs, staff present during the incident/repairs and causes of the pressure loss. These reports must be submitted by email to the EPA Points of Contact.

GENERAL PROVISIONS

42. This Order does not affect any legal requirement or EPA's legal enforcement options in this matter. This Order constitutes final agency action. Under Section 1448(a) of the SDWA, 42 U.S.C. § 300j-7(a), Respondent may seek federal judicial review of SDWA Section 1431 emergency orders.
43. EPA may modify or supplement this Order. Any such modifications or supplementations shall be in writing to Respondent, effective upon EPA's issuance of the supplement or modification, and unless explicitly stated, shall not otherwise terminate or change any compliance obligations contained in this Order.
44. This Order does not relieve Respondent from its obligation to comply with applicable federal, tribal, or local law.
45. Pursuant to SDWA Section 1431(b), 42 U.S.C. § 300i, in the event Respondent violates, fails or refuses to comply with any of the terms or provisions of this Order, EPA may commence a civil action in U.S. District Court to require compliance with this Order and to assess a civil penalty of up to \$29,154 per day of violation under the SDWA, as adjusted by the Federal Civil Penalties Inflation Adjustment Act of 1990, amended by the Debt Collection Improvement Act of 1996, and the subsequent Civil Monetary Penalty Inflation Adjustment Rule, 40 C.F.R. Part 19.
46. EPA reserves all rights against the Respondent and all other persons to take any further civil, criminal, or administrative enforcement action pursuant to any available legal authority. Nothing in this Order shall preclude EPA from taking any additional enforcement actions,

including modification of this Order or issuance of additional Orders, and/or additional actions as the EPA may deem necessary, and/or from requiring Respondent in the future to perform additional activities pursuant to the SDWA or any other applicable law.

47. The provisions of this Order shall be deemed satisfied upon Respondent's receipt of written notice from EPA that Respondent has demonstrated, to the satisfaction of EPA, that the terms of this Order, including any additional tasks determined by EPA to be required under this Order or any continuing obligation or promises, have been satisfactorily completed.

Issued and effective this 6th day of November 2024.

Amy C. Miller-Bowen, Director
Enforcement & Compliance Assurance Division
U.S. Environmental Protection Agency, Region 9

Of counsel:

Alexa Engelman
Office of Regional Counsel
U.S. EPA – Region 9

List of Appendices

Appendix A: Boil Water Notice Template

Appendix B: Monthly Progress Report Template

APPENDIX A: BOIL WATER NOTICE TEMPLATE

DRINKING WATER WARNING

PRECAUTIONARY BOIL WATER ADVISORY

Water Served By Havasu Water Company May be Unsafe Following Loss of Water Pressure

Our water system recently experienced an incident on **INSERT DATE**, which resulted in a subsequent loss of system pressure and water for customers. We cannot verify that our distribution system is free of fecal coliform bacteria.

What should I do?

- **WE RECOMMEND TO NOT DRINK THE WATER WITHOUT BOILING IT FIRST.** Bring all water to a boil, let it boil for one minute, and let it cool before using, or use bottled water. Boiled or bottled water should be used for drinking, making ice, brushing teeth, washing dishes, and food preparation **until further notice**. Boiling kills bacteria and other organisms in the water.
- Inadequately treated water may contain disease-causing organisms. These organisms include bacteria, viruses, and parasites which can cause symptoms such as nausea, cramps, diarrhea, and associated headaches.
- The symptoms above are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice. People at increased risk should seek advice about drinking water from their health care providers.

What happened? What is being done?

When a loss of pressure occurs in a water system, there is a risk that contamination happens through backpressure or back siphonage. We will be taking water samples throughout our distribution system to check for the presence of fecal coliform bacteria following the resolution of the incident.

For more information, please contact the following:

Water Utility contact: Jennifer Hodges, Owner: (760) 858-4619

Local Environmental Health contact: San Bernardino County: (800) 442-2283

Environmental Protection Agency contact: Program Manager: Annie Wan, wan.annie@epa.gov, (415) 972-3845

General guidelines on ways to lessen the risk of infection by microbes are available from the EPA Safe Drinking Water Hotline: 1(800) 426-4791.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice has been distributed to you by the Havasu Water Company (Public Water System ID#:090600202) on: **INSERT DATE**

**APPENDIX B:
MONTHLY PROGRESS REPORT TEMPLATE**

Emergency Administrative Order
Havasu Water Company Public Water System
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Paragraph #	Requirement	Due Date	Current Status
23	Intent to comply	24 hours of the effective date	
25-26	Issue Boil Water Notice	Within 24 hours of learning about water outage	
27-29	Collect total coliform bacteria samples with negative results	Prior to EPA approval to lift BWN	
31-32	Submit emergency SOP for pressure loss	30 days of the effective date	
33, 37	Make available alternative water	During water outages	
34-36	Submit Alternative Water Source Plan	7 days of the effective date	
38(a)	Identify Technical Provider for Approval	14 days of the effective date	
38(b)	Retain Technical Provider	48 hours of EPA's approval of Technical Provider	
38(c)-(d)	Submit Work Plan	14 days of EPA's approval of Technical Provider	
38(e)	Submit Technical Report	7 days of completion of Technical Report	
38(f)	Implementation of Technical Report	14 days of EPA identification of deficiencies	
39	Distribution Operator Duties – Distribution Operator Logs	Monthly – no later than 10 days after the previous month	
40	Treatment Operator Duties – Treatment Operator Logs	Monthly – no later than 10 days after the previous month	
41	Monthly Progress Report	Monthly - by the last day of each month	