



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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July 30, 2021

2:16 PM

Received by
EPA Region VIII
Hearing Clerk

July 30, 2021

Ref: 8ENF-W-SD

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Ms. Sandy Fitzpatrick, District Clerk
sfitzpatrick@valleyviewschool.net

Ms. Carolyn Hall, Lake County Superintendent of Schools for Lake County
lacosupt@lakemt.gov

Re: Emergency Administrative Order Addendum, Valley View School District regarding
Valley View Elementary School Public Water System, PWS ID #083090311
Docket # SDWA-08-2021-0024

Dear Ms. Fitzpatrick and Ms. Hall:

This is an Addendum to the Emergency Administrative Order (Order) issued to the Valley View School District (District) on June 2, 2021. The purpose of this letter is to approve the District's July 1, 2021 schedule (Schedule) for coming into consistent compliance related to the confirmed *E. coli* contamination and required corrective measures of the Order. The Schedule is hereby incorporated into the Order pursuant to paragraph 19. Each milestone and deadline specified below is an enforceable provision of the Order.

<u>Milestone</u>	<u>Deadline</u>
1. Post boil water advisory until notified by the EPA that you may discontinue the posting.	Completed
2. Daily "special" samples put on hold until construction is completed and the system has been disinfected and flushed.	Daily "special" samples on hold starting July 2, 2021. Daily "special" sampling will resume following construction completion and disinfection and flushing (see milestones 5-9).
3. De-water the cistern, evaluate the plumbing, and test the well and pump.	Completed on June 26, 2021.
4. Hire a certified water operator. Provide operator contact information to EPA	Certified water operator hired by July 1, 2021. Provide operator contact information to EPA by August 6, 2021.

5. Complete construction by properly abandoning the cistern and plumb the well directly to the school.	Completed on July 28, 2021.
6. Notify the EPA of construction completion. Complete PWS Inventory Change Form and submit to the EPA.	Within 10 days following construction completion.
7. Disinfect and flush storage tank and distribution system.	Within 10 days following construction completion.
8. Provide daily updates to EPA on the progress of disinfecting and flushing the System, as well as monitoring for total coliform and chlorine residual according to paragraph 29 of the Order requirements.	Beginning on first day of disinfection and flushing and continuing until notified by the EPA that daily updates are no longer needed.
9. Per paragraph 23 of the Order, collect consecutive daily (one sample per day) “special purpose” total coliform samples from the distribution system until notified in writing by the EPA that consecutive daily samples may be discontinued. Email each result to the EPA immediately upon receipt of the analysis from the laboratory.	Beginning on the first date when no chlorine residual is detected following disinfection and flushing.
10. Per paragraph 24 of the Order, after receiving written notification from the EPA that consecutive daily “special” total coliform sampling may be discontinued, collect weekly “special” total coliform samples (one sample per week).	The first week after being notified by the EPA that consecutive daily samples may be discontinued.
11. Per paragraph 25 of the Order, after receiving written notification from the EPA that weekly “special” total coliform sampling may be discontinued, resume monthly routine total coliform sampling as required by 40 C.F.R. § 141.854 to determine compliance.	The first month after being notified by the EPA that consecutive daily samples may be discontinued.
<i>If the aforementioned items are not completed prior to the teachers returning to the school, the public notice must remain posted and an alternate water supply will be required to be provided until notified otherwise by the EPA.</i>	

As a reminder, per paragraph 16 of the Order, the District is required to provide the public with an alternative potable water supply that is available at no cost to all users of the System as needed for drinking, hand washing, cooking, maintaining oral hygiene, and dish washing. The District shall provide at least two liters of potable water daily per person at a central location that is accessible to all persons served by the System. The alternate water supply shall be made available until the District receives written notification from the EPA that it is no longer necessary to supply it.

Within 10 calendar days of completing all steps included in the above Schedule, please notify the EPA of the project’s completion as required by the Order. The EPA is authorized to seek penalties if these deadlines are not met. If you have a reasonable basis to believe it may be unable to meet any deadline in the Schedule, you must notify the EPA well in advance of the Scheduled deadline to request an extension. The EPA may, in its discretion, consider granting an extension.

In addition, the EPA acknowledges that the COVID-19 pandemic also may impact construction projects. If you have specific COVID-19 issues that would affect the timeframes listed herein, please contact Christina Carballal-Broome via email at Carballal-Broome.Christina@epa.gov or by phone at (800) 227-8917, extension 6046, or (303) 312-6046 as soon as possible. The EPA may, in its discretion, consider granting an extension.

If you have any questions concerning this Addendum, please contact Christina Carballal-Broome at the email and phone number listed in the above paragraph. Any questions from your attorney should be directed to Matthew Castelli, Senior Assistant Regional Counsel, via email at castelli.matthew@epa.gov or by phone at (800) 227-8917, extension 6491, or (303) 312-6491.

Sincerely,

Colleen Rathbone, Chief
Water Enforcement Branch
Enforcement and Compliance Assurance Division

cc: Missy Haniewicz, EPA Regional Hearing Clerk
Diana Luke, Program Director (dluke@lakemt.gov)
Mike Lien, Operator (n2h2o4u@polson.net)
The Honorable Shelly R, Fyant, Chairwoman, Confederated Salish and Kootenai Tribes
(shelly.fyant@cskt.org)
Wilhelmina Keenan, Environmental Director (willie.keenan@cskt.org)