



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 W. 15th STREET, SUITE 3200
HELENA, MONTANA 59626

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anna Whiting Sorrell, Director
IHS Billings Area Office
P.O. Box 3600
Billings, MT 59107

Re: Administrative Order
Docket No. SDWA- 08-2013-0013
Blackfeet Community Hospital
Public Water System
PWS ID #083090092

Dear Ms. Sorrell:

On March 8, 2013, the U.S. Environmental Protection Agency (EPA) issued an Administrative Order (Order) to the Indian Health Services (Respondent) as owner and/or operator of the Blackfeet Community Hospital public water system (System), to comply with various regulations issued by EPA under the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300f *et seq.*

On March 19, 2013, the EPA received from the Respondent an initial proposed Plan to come into compliance with the total coliform rule. The EPA advised the system during an enforcement inspection on March 21, 2013, that additional information would be required before approving the Plan. We are requesting that the following additional information be forwarded within two weeks of receipt of this letter to address paragraph 16, on page 3 of the Order:

- 1. An update to the attached detailed Distribution System map to describe the following: 1) the flow of water from each source (the primary source from the three active groundwater wells and the secondary, backup source from Town of Browning), 2) the sources for each building (or taps within the building if a building receives water from multiple sources), 3) the location of all valves throughout the System which are used to turn on/off the water sources, and 4) indicate all the locations of the sampling sites.*

EPA understands that the System's primary source is the wells. In the event that there are pressure, capacity or water quality issues the System may be served by the secondary source, which at this time is the Town of Browning. EPA also understands, that under normal operation, the hospital housing and "treatment center" will be served by the Town of Browning and will remain served by the Town of Browning unless there are pressure, capacity or water quality issues, in which case one or both may be provided water from the System's primary source.



2. *A plan for how the Respondent will notify EPA, the circumstances requiring notification, and the adjustments to be made to the System when there is a need to switch between sources;*

IHS indicated that they will notify the EPA via phone and email should pressure, capacity or quality issues arise that would cause a need to switch sources. The EPA requests that the Respondent clearly identify when sources will be switched (e.g. pressure less than 20 psi, or turbidities greater than 1 NTU, etc.), and how the determination will be made to return to the primary source

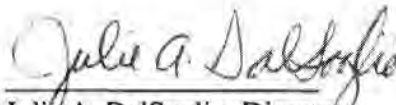
3. *A plan and schedule to address the ongoing total coliform violations. This shall include plans to add full-time disinfection, to locate and abate the source of coliform contamination, to use a new source of safe water, or a combination of these changes.*

The March 19, 2013, submitted Plan does not include any additional action to address the ongoing total coliform violations and does not clearly identify current practices for preventing total coliform violations. The EPA requests that the updated prevention and maintenance guidance be provided along with a new Plan on how to address the ongoing total coliform violations. The Plan could include increased cleaning/inspection of the System's cisterns, monitoring of total coliform before and after the filter, consulting with EPA immediately upon learning of a TC + sample result, flushing of the System after switching sources, or plans for full-time disinfection of the entire System.

If you would like additional information, please feel free to contact me directly at (800) 457-2690, extension 5025, or (406) 457-5025. If your staff has technical questions, they may contact Sienna Meredith at (800) 457-2690, extension 5026, or (406) 457-5026. If you are represented by an attorney or have legal questions, please contact Amy Swanson, Enforcement Attorney, at (800) 227-8917, extension 6906, or at (303) 312-6906.

We urge your prompt attention to this matter.

Sincerely,



Julie A. DalSoglio, Director
EPA Region 8 Montana Office