

FILED

Nov 12, 2025

10:15 AM

U.S. EPA REGION 8
HEARING CLERK



REGION 8

DENVER, CO 80202

November 5, 2025

Ref: 8ECA-W-S

SENT VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

City of Forbes
c/o The Honorable Carl Kronberg, Mayor
City of Forbes Public Water System
P.O. Box 66
Forbes, ND 58439-0066

Subj: Administrative Order Addendum, City of Forbes Public Water System, PWS ID
#ND1100346, Docket # SDWA-08-2025-0027

Dear Mayor Kronberg:

This is an Addendum to the Administrative Order (Order) issued on July 30, 2025, to the City of Forbes (City). The purpose of this letter is to approve the City's September 11, 2025 schedule (Schedule) for coming into compliance with the requirements of the Lead and Copper Rule Improvements of 40 C.F.R. part 141 (Part 141), specifically 40 C.F.R. §§ 141.84, 141.85, and 141.90. 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.

Milestone	<u>Deadline</u>
Issue a Tier 2 Public Notification for failure to complete the initial service line inventory	Completed September 12, 2025
Issue a Tier 3 Public Notification for failure to submit the initial service line inventory	Completed September 12, 2025
Send EPA case manager quarterly enforcement reports until violations are returned to compliance	Commencing on December 10, 2025, then quarterly thereafter

Subj: Administrative Order Addendum, City of Forbes regarding City of Forbes Public Water System, PWS ID #ND1100346, Docket # SDWA-08-2025-0027

Milestone	<u>Deadline</u>
Complete initial service line inventory	February 20, 2026. The City is working with NDDEQ and ND Rural Water to complete and submit the initial service line inventory.
Submit initial service line inventory to EPA and NDDEQ	March 2, 2026
Make the LSLI publicly available and notify and provide required public education materials to all customers served by a lead service line, galvanized pipe(s) requiring replacement, or a lead status unknown service line	March 22, 2026
Provide the EPA and NDDEQ with a copy of the public education provided to consumers	April 1, 2026
Notify the EPA of the project's completion as required by the Order	Within 10 calendar days of completing all steps included in the above Schedule

The Order also requires the City to achieve and maintain compliance with 40 C.F.R. §§ 141.84, 141.85, and 141.90 by the final date specified in the approved Schedule. If the City has a reasonable basis to believe it may be unable to meet any deadline in the Schedule, it 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.

If you have any questions or to request an informal conference with the EPA, please contact Elizabeth Tyson via email at tyson.elizabeth@epa.gov, or by phone at (800) 227-8917, extension 6646, or (303) 312-6646. Any questions from the City's attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at bearley.mia@epa.gov, or by phone at (800) 227-8917, extension 6554, or (303) 312-6554.

Sincerely,

Suzanne Bohan, Director
Enforcement and Compliance Assurance Division

cc: Sandi Washek, NDDEQ Lead and Copper Rule Manager (swashek@nd.gov)
Greg Wavra, NDDEQ Drinking Water Program Manager (gwavra@nd.gov)
Brandon Carlson, Dickey County Commissioner District 3 (carlsonbrandon@nd.gov)
EPA Regional Hearing Clerk (r8_hearing_clerk@epa.gov)
Darci Wolff, City of Forbes Auditor (mdwolff@drtel.net)
Eric Volk, ND Rural Water Executive Director (ericvolk@ndrw.org)