



April 4, 2025

Ref: 8ECA-W-S

SENT VIA EMAIL  
DIGITAL DELIVERY RECEIPT REQUESTED

Keith and Helen Hilton  
Park Café and Grocery  
[hkh.electric@yahoo.com](mailto:hkh.electric@yahoo.com)

Subj: Emergency Administrative Order Addendum, regarding Park Café and Grocery Public Water System, PWS ID #083090095 Docket # SDWA-08-2024-0043

Dear Keith Hilton and Helen Hilton:

This is an Addendum to the Emergency Administrative Order (Order) issued to you as Respondents on September 10, 2024. The purpose of this letter is to approve your January 15, 2025, 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 18. Each milestone and deadline specified below is an enforceable provision of the Order.

<u>Milestone</u>	<u>Deadline</u>	<u>Projected Cost</u>
1. Post (and update as applicable) the boil water advisory until notified in writing by the EPA that you may discontinue the posting.	Posting was completed on September 7, 2024; update posting prior to opening for the 2025 season as applicable.	
2. Provide an alternative water source until notified otherwise in writing by the EPA.	Begun on September 11, 2024.	TBD
3. Regarding a proposed well location, the EPA must be consulted prior to design and construction.  The well design and construction <i>should</i> conform to applicable tribal standards, and required permits must be obtained prior to well	Prior to well construction.	TBD

<p>construction. A copy of EPA Region 8's Tech Tips for wellheads is also enclosed for reference. In the absence of tribal standards, the well design and construction <i>should</i> consider, as guidance, the general well construction standards found in Circular DEQ-3-2023, Section 3.2.5: <a href="https://deq.mt.gov/files/Water/WQInfo/Documents/Subdivisions/DEQ-3-2023.pdf">https://deq.mt.gov/files/Water/WQInfo/Documents/Subdivisions/DEQ-3-2023.pdf</a></p>		
<p>4. Drill/complete new well and install pump.</p>	<p>June 19, 2025, unless an alternate deadline is approved by EPA.</p>	<p>\$30,000</p>
<p>5. Disconnect the existing well from the distribution system.</p> <p>Alternately, the existing well may be abandoned. If abandoned, the well should be abandoned in accordance with applicable tribal standards, or in the absence of such standards, the well abandonment <i>should</i> consider, as guidance, the standards found in Circular DEQ-3-2023, Section 3.2.5.9: <a href="https://deq.mt.gov/files/Water/WQInfo/Documents/Subdivisions/DEQ-3-2023.pdf">https://deq.mt.gov/files/Water/WQInfo/Documents/Subdivisions/DEQ-3-2023.pdf</a></p>	<p>June 19, 2025, unless an alternate deadline is approved in writing by the EPA.</p>	<p>TBD</p>
<p>6. Notify the EPA of construction completion. Complete PWS Inventory Change Form and submit to the EPA: <a href="https://www.epa.gov/region8-waterops/epa-r8-public-water-system-inventory-change-form">https://www.epa.gov/region8-waterops/epa-r8-public-water-system-inventory-change-form</a></p> <p>A copy of the as-built well construction and completion records should be included with the Inventory Change Form.</p>	<p>Within 5 business days following construction completion.</p>	
<p>7. Disinfect and flush the system (once EPA allows) per paragraph 20 of the Order.</p>	<p>Within 24 hours after the corrective action has been taken.</p>	<p>TBD</p>
<p>8. 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.</p>	<p>Beginning on the first date when no chlorine residual is detected following disinfection and flushing and continuing until</p>	<p>TBD</p>

Email each result to the EPA immediately upon receipt of the analysis from the laboratory.	receiving written notification from the EPA.	
9. Resume monthly routine total coliform sampling as required by 40 C.F.R. § 141.854 to determine compliance.	After being notified in writing by the EPA that consecutive daily samples may be discontinued	
10. Collect weekly “special” total coliform samples (one sample per week).	The first week after being notified in writing by the EPA that consecutive daily samples may be discontinued and continuing until receiving written notification from the EPA.	TBD
11. Notify the EPA in writing of the project’s completion as required by the Order.	Within 10 calendar days of completing all milestones.	
<p><b>Note:</b> If a facility (e.g., well) is taken offline and planned to be brought back online during the emergency:</p> <p><b>When the facility is taken offline:</b></p> <ul style="list-style-type: none"> <li>i. The System must keep the boil water advisory posted/updated as necessary and provide an alternate water source until notified in writing by the EPA.</li> <li>ii. Disinfect and flush the system.</li> <li>iii. Once the chlorine levels have returned to zero, collect special daily samples until notified in writing by the EPA.</li> </ul> <p><b>b. When the facility is reconnected:</b></p> <ul style="list-style-type: none"> <li>i. The system must repost the boil water advisory/provide an alternate water source until notified in writing by the EPA</li> <li>ii. Disinfect and flush the system</li> <li>iii. Once the chlorine levels have dissipated or returned to normal levels, collect special daily samples until notified in writing by the EPA.</li> </ul>		

Per paragraph 15 of the Order, you are 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. You 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 you receive written notification from the EPA that it is no longer necessary to supply it.

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.

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If you have any questions or to request an informal conference with the EPA, please contact Chris Brown via email at brown.christopher.t@epa.gov, or by phone at (800) 227-8917, extension 6669, or (303) 312-6669. Any questions from your 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,

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

#### ENCLOSURES

cc: The Honorable Rodney Gervais, Chairman, Blackfeet Tribe  
Gerald Wagner, Environmental Director  
Derek Kline, Tribal Attorney  
Quentin Allen, Division of Sanitation Services Construction, Indian Health Service  
Todd Rydquist, Division of Sanitation Services Construction, Indian Health Service  
Mike Racine, Tribal Utility Consultant, Indian Health Service  
EPA Regional Hearing Clerk (r8\_hearing\_clerk@epa.gov)