



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

2014 FEB -6 AM 8:59

FEB 5 2014

FILED
EPA REGION VIII
HEARING CLERK

Ref: 8MO

CERTIFIED MAIL LETTER
RETURN RECEIPT REQUESTED

Mr. Russell Jessop, Administrator
Town of Pinesdale
P.O. Box 410228
Pinesdale, MT 59841

Re: 5th Addendum to the Administrative Order
Docket No. SDWA-08-2008-0106
Town of Pinesdale Public Water System
PWS ID #MT0002926

Dear Mr. Jessop:

On September 19, 2008, the US Environmental Protection Agency (EPA) issued an Administrative Order (Order), Docket No. SDWA-08-2008-0106, ordering the Town of Pinesdale (Town) to comply with various regulations issued by EPA under the Safe Drinking Water Act, 42 U.S.C. § 300f *et seq.* Since the Order was issued, the Town has submitted, and EPA has approved, several Addendums to incorporate into the Order plans for treatment that will ensure compliance with effluent turbidity limits and disinfection byproducts (DBP) maximum contaminant levels (MCL). The previous Addendums approved extensions for interim deadlines of the schedule while keeping the final compliance date of December 2014. During this time, the Town has worked closely with Montana Rural Water, the Montana Department of Environmental Quality (MDEQ) and United States Department of Agriculture - Rural Development, who all agree that the Town needs to conduct a more comprehensive pilot test during the spring run-off to ensure the effectiveness of the proposed treatment. Therefore, the Town is requesting approval to submit a new plan and schedule that includes a pilot test and will extend the deadline for final compliance.

On November 15, 2013, Russell Jessop, on behalf of the Town, requested approval to submit a new plan and schedule for bringing the System into consistent compliance with the turbidity and disinfection byproducts requirements.

This 5th Addendum approves the schedule below for implementing treatment adjustments to prevent future turbidity exceedances and DBP violations, securing funding for and conducting a pilot study during Spring 2014, and a requirement to provide EPA with a new plan and schedule which include a final deadline for installing treatment. The new plan and schedule shall be provided to EPA no later than October 31, 2014.

Town of Pinesdale Compliance Plan and Schedule

<u>Action</u>	<u>Deadline Date</u>
If finished water turbidity exceeds 1.0 NTU, the Town will shut off incoming raw water from entering treatment and distribution systems until turbidity levels decline. The Town will use finished water from the storage tank and implement community awareness program.	Spring 2011 – Project Completion
The Town will implement a pH adjustment plan the water treatment plant to help reduce DBP production and violations.	January 31, 2014
The Town will secure funding for a new pilot study to be conducted during Spring 2014.	January 31, 2014
The Town will meet with MDEQ to discuss the various types of technologies that they would consider appropriate for long term compliance with turbidity and disinfection byproducts.	January 31, 2014
The Town and the Engineer will conduct research to determine the best technology and work with manufacture on developing a set of design criteria for the pilot study based on the water quality information that the town has collected to date.	January 31, 2014
The Town will select treatment technology and sign agreement with equipment supplier for pilot testing phase. Provide a copy of agreement to EPA upon request.	March 31, 2014
The Town will begin pilot testing.	April 30, 2014
The Town and the Engineer will utilize the pilot study results to submit the final Preliminary Engineering Report (PER) to MDEQ and EPA.	September 30, 2014
Upon approval of final designs by MDEQ, submit a detailed Plan and Schedule to EPA. The Plan and Schedule shall include construction milestones and a final deadline for installation of the permanent treatment system that will return the system to consistent compliance with the turbidity and disinfection byproducts requirements.	October 31, 2014

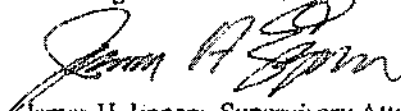
Please note that EPA expects this approved schedule to be met. While not creating any right to an extension, EPA may in its discretion consider granting an extension to any deadline in the schedule under limited circumstances. If unexpected events occur that are beyond the Town’s control and that may prompt the Town to request an extension of these deadlines, the Town will be responsible for notifying EPA well in advance of the deadline dates. EPA will not consider extending these deadlines without a clear justification for their need. The Town must provide the following information in any request for extensions: a description of the work that has been completed and the additional work that may not be completed by the deadline dates, the unexpected events that occurred and how the Town attempted to foresee or overcome these obstacles, the proposed new deadline dates, and an explanation that justifies the new proposed deadline dates.

Please be advised that the Town is required to comply with all provisions of the Order. Penalties for failing to comply are set forth in the Order. Please contact Sienna Meredith, at 1-800-457-2690 or (406) 457-5026 if you have any questions concerning this Addendum. If the Town is represented by an attorney who has questions, please ask the attorney to call Marc Weiner, Enforcement Attorney, at 1-800-227-8917, extension 6913, or at (303) 312-6913.

Sincerely,



Julie A. DalSoglio, Director
I:PA Region 8 Montana Office



James H. Ippers, Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

cc:

John Arrigo, MDEQ
Shelley Nolan, MDEQ
Tina Artemis, I:PA Regional Hearing Clerk