



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Ref: 8ENF-W

EPA REGION VIII  
TRAINING BUREAU

CERTIFIED MAIL LETTER  
RETURN RECEIPT REQUESTED

Hirst Applegate Registered Agent Services, Inc., Registered Agent  
Tata Chemicals North America, Inc.  
1720 Carey Ave., Ste. 400  
Cheyenne, WY 82001

Re: Administrative Order Addendum  
Tata Chemicals (Soda Ash) Partners  
Public Water System  
Docket No. SDWA-08-2012-0029  
PWS ID #WY5600636

Dear Madame/Sir:

Pursuant to paragraph 10 of the Administrative Order (Order) issued June 21, 2012, to Tata Chemicals North America, Inc., (Company) as owner and/or operator of the Tata Chemicals (Soda Ash) Partners public water system (System), this Addendum to the Order incorporates the schedule for completing the actions at the System as outlined in the Company's letter of July 11, 2012. This letter constitutes the written approval by EPA of Tata Chemicals North America, Inc.'s, schedule as indicated in the chart below.

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 System's control and that may prompt the Company to request an extension of these deadlines, the System 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 Company 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 Company attempted to foresee or overcome these obstacles, the proposed new deadline dates, and an explanation that justifies the new proposed deadline dates.

Action

Finish Date

Modify pressure release valve (of chlorine injection system) discharge location.	July 19, 2011 (completed)
Switch clarification aid (used at chlorine injection system) from Betz KlarAid IC1183P to ChemTreat P891L	July 2011 (completed)
Supervisor/Operator training on manual chlorine addition.	August 1, 2012 (completed)

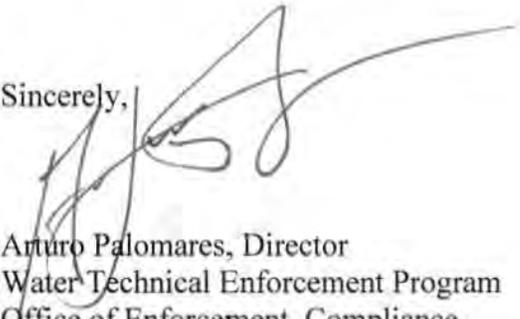
Notify EPA of completion of all tasks	September 1, 2012. (completed)
Achieve compliance with the maximum contaminant level (MCL) for haloacetic acids (five)(HAA5).	January 10, 2013.

Consistent with paragraph 11 of the Order, the "Finish Date" deadlines above are now enforceable requirements of the Order.

Following from its telephone discussion with the Company on August 24, 2012, regarding the plan as originally proposed, the EPA encourages the Company to undertake the following optional steps to help ensure sustained compliance with the MCL for HAA5 moving forward. First, the company should complete a disinfection profile to determine the optimal seasonal chlorine feed dosage. (Surface Water Treatment Rule manager Mindy Mohr, telephone (303) 312-6525, can provide detailed information and assistance on the disinfection profile procedure.) The Company should also assess its pre and post-filtration chlorination options with a sight towards reducing the potential for DBP formation while still meeting the inactivation requirement for *Giardia* and viruses. Finally, the Company should complete chlorine valve replacement, discussed as a possibility during the August 24 call, to help ensure reliable chlorine feed and consistent chlorine residual levels throughout the distribution system.

Please be advised that the Company is required to comply with all provisions of the Order. Penalties for failing to comply are set forth in the Order. Please contact Mario Mérida at (303) 312-6297 if the Company has any questions concerning this Addendum. The Company's attorney may call Peggy Livingston, Enforcement Attorney, at (303) 312-6858 with questions regarding any related legal matter.

Sincerely,



Arturo Palomares, Director  
Water Technical Enforcement Program  
Office of Enforcement, Compliance  
and Environmental Justice

Margaret J (Peggy) Livingston, Acting for  
James H. Eppers, Supervisory Attorney  
Legal Enforcement Program  
Office of Enforcement, Compliance  
and Environmental Justice

cc: Tina Artemis, EPA Regional Hearing Clerk  
WY DEQ/DOH (via email)  
Lee Bruder, Senior Environmental Technician,  
Tata Chemicals (Soda Ash) Partners (via email)