



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Cedric Black Eagle, Chairman
Crow Indian Tribe
P.O. Box 400
Crow Agency, MT 59022

Vianna Stewart, Superintendant
BIA Crow Agency
U.S. Department of Interior
P.O. Box 69
Crow Agency, MT 59022

RE: **Emergency Administrative Order**
Second Addendum
Docket No. SDWA-08-2011-0045
Crow Agency Water System
PWS ID 083090011

Dear Chairman Black Eagle and Superintendant Stewart:

As you are aware, EPA issued an Emergency Administrative Order (EAO) to the Crow Tribe and BIA following intermittent low water pressure in the community of Crow Agency beginning on May 24. This letter serves as follow up to email notification from Barbara Burkland of EPA on June 23, 2011, to Leroy Cummins, Bruce Ward, Chris Dillon, Jim Real Bird, Larry Kindness and John Doyle, that coliform sampling requirements may be reduced from weekly to monthly and daily monitoring of chlorine residual and water pressure is no longer needed. We are still seeking information on the operational status of all monitoring equipment at the two plants.

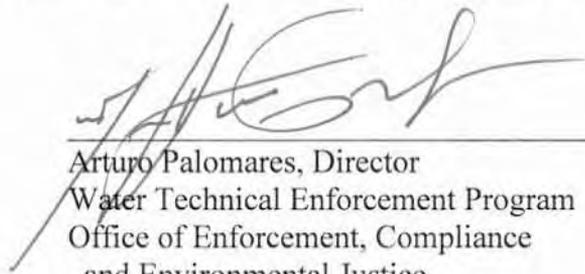
Paragraph 18 of the EAO requires that the operational status of monitoring and recording equipment be verified. The attached table was sent by email from Barbara Burkland to Bruce Ward, Leroy Cummins and Chris Dillon, requesting their corrections to our understanding of the operational condition of this equipment. Please submit updated information on the status of this equipment to EPA immediately.

Paragraph 25 of the EAO states that the system may resume monthly coliform sampling upon receiving written notification from EPA. Please consider the June 23 email and this letter to be that notification. Please continue to monitor and record chlorine residual at the same time and location as your monthly samples, as usual.

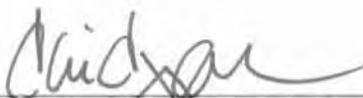
Paragraph 23 of the EAO requires that tap pressure be monitored at the same time and location as total coliform samples required in paragraph 22 of the EAO. This monitoring is no longer required.

Paragraph 26 of the EAO states that analytical results must be sent to EPA within 24 hours of receiving those results from the lab. This is no longer required. Monthly sample results may now be submitted by the 10th of the following month, as usual. Please contact EPA immediately if any results are positive for coliform bacteria, however.

Should you have questions about these or other requirements of the EAO, you may contact Barbara Burkland in the EPA Montana Office, who can be reached at (406) 457-5009, or your attorney may contact Amy Swanson, Enforcement Attorney, who can be reached at (303) 312-6906.



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



David J. Janik, Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

- cc: Leroy Cummins, Facility Manager, BIA Crow Agency
Darrell Bright Wings & Eugene Bird in Ground, Tribal Operators, TP-01
Chris Dillon, Acting Manager, Apsalooke Water and Wastewater Authority, TP-02
Carole Boerner, IHS
Bruce Ward, BIA Facilities
Jim Real Bird, Apsalooke Water and Wastewater Board
John Doyle, Apsalooke Water and Wastewater Board
Larry Kindness, Apsalooke Water and Wastewater
Tina Artemis, EPA Region 8 Regional Hearing Clerk

**Operational status of control, monitoring and reporting equipment
Crow Agency water treatment plants**

Component	BIA plant, TP-01	Tribal plant, TP-01
Influent flow meter	Needs Replacement or Repair	Working
Effluent flow meter	Needs Replacement of Repair	None Found
pH meter One reading daily is acceptable, this is for purposes of adjusting chemical doses and determining if contact time is adequate for deactivating giardia. Also used to determine disinfection byproduct classification.	Hand held, working	In line, Not working, Needs Replacement part for Accurate readings of pH. Parts are in house.
Thermometer One reading daily is acceptable, this is for purposes of adjusting chemical doses and determining if contact time is adequate for deactivating giardia.	On hand held PH meter	Working
Raw water turbidimeter One reading daily is acceptable, this is for purposes of adjusting chemical doses.	Working, but likely needs calibration, verification Scatter 6. Working, Unit is obsolete. No replacement parts available.	Scatter 6. Needs replacement. Light source Assembly is damaged and no replace parts are available.
Filter 1 turbidimeter	In line, working Model: 1720C Calibrated last: May 6 th and May 30 th	NA (1 filter only)
Continuous data recorder, Filter 1 turbidity	Strip chart recorder Working	NA
Filter 2 turbidimeter	In line, working Model: 1720 D Calibrated last: May 6 th and	NA

	May 30th	
Continuous data recorder, Filter 2 turbidity	Strip chart recorder If not working, why?	NA
Combined filter effluent turbidimeter	In line, working Model: 1720 D Calibrated last: May 6 th and May 30th	In line, working Model: 1720 D Calibrated last: May 25th
Chlorine monitor I noted a difference between the BIA plant reading and that on my hand held (plant was 1.57, mine was 1.3)	CI-17, Calibrated last: May 6 th . A new CI-17 is waiting to be installed until surge protection is installed.	CI-17 Not working,
Telemetry for tank levels	Not working	Not working (but looks like it could be activated on SCADA system). Only one of the two plants needs this capability as they share the distribution system, including tanks.
Automated features of plant	Not Working. Parts being ordered for automation	Backwash of filter is set to manual, parts being ordered to repair automation of backwash.