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EPA REGION VIII
RECORDING CLERK



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

AUG 29 2011

Ref: 8MO

CERTIFIED MAIL LETTER
RETURN RECEIPT REQUESTED

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

Re: 3rd Addendum to Administrative Order
Docket No. SDWA-08-2008-0106
Town of Pinesdale Public Water System
PWS ID #MT0002926

Dear Mr. Jessop:

Pursuant to paragraph 14 of the Administrative Order (Order) issued September 18, 2008 to the Town of Pinesdale (the Town) regarding the Town's public water system, this Addendum to the Order approves the revised plan and schedule of actions submitted to EPA by Kadmas, Lee & Jackson (KLJ), the Town's consulting engineers, on behalf of the Town on July 1, 2011, and incorporates the new schedule into the Order.

EPA approved the Town's previous compliance plan and schedule on January 26, 2011. The Town's July 1, 2011 plan and schedule includes changes to the timing and scope of the bench scale testing and pilot study, as well as additional details on the installation of a mechanical tank mixer in the storage tank to address recent disinfection byproducts violations. EPA, DEQ, the Town, and KLJ engaged in collaborative discussions on July 11, 2011 where these proposed changes were discussed. EPA, the Town and KLJ held additional discussions during a site visit on August 18, 2011. As a result, the deadlines for the installation of the static mixer, submittal of the Pilot Study Protocol and final report have been altered and are memorialized in an August 23, 2011 letter from the Town to EPA. These changes are also

reflected below. All dates associated with tasks from 2012 through 2014 remain unchanged from the previously approved plan and schedule, with a completion date of December 2014.

EPA appreciates the ongoing efforts by the Town and KLJ to ensure safe drinking water at this public water system.

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.

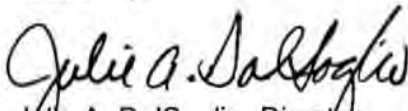
Town of Pinesdale
Compliance Plan and Schedule


<u>Action</u>	<u>Deadline Date</u>	<u>Completion Date</u>
Collect daily raw and finished water turbidity samples for bench test, and compliance monitoring samples required by DEQ.	March 2010 – June 2011	April 2011
If finished water turbidity exceeds 1.0 NTU, shut off incoming raw water from entering treatment and distribution systems until turbidity levels decline. Use finished water from the storage tank and implement community awareness program.	Spring 2011 – December 2014	On-going
Complete bench scale testing for confirmation of process selection	May 2011	June 2011
DEQ approval of plans and specifications for installation of mixer to the storage tank. Solicit quotes for installation of mixer.	June 2011	June 2011

Submit Pilot Study Protocol and Process Selection Report to EPA and DEQ for recommendations or comments.	June 2011	July 2011
Conduct pilot study of the selected treatment process.	December 2011	On-going
Installation of the mechanical mixer to the storage tank.	October 2011	On-going
Submit pilot study report to EPA and DEQ for review.	January 2012	
Write PER for improvements to treatment plant and develop a funding strategy.	March 2012	
Submit applications and PER to state and federal funding agencies for treatment plant construction Submit copy to EPA	April 2012	
Funding awarded for treatment plant, begin design of treatment plant	May 2013	
Complete design of the treatment plant improvements and submit to DEQ and funding resources for review.	December 2013	
Bid and award contract for treatment plant improvements construction	February 2014	
Begin construction of the treatment plant improvements project.	May 2014	
Start-up, testing, and operator training completed. System achieves final Compliance.	December 2014	

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 (406) 457-5026 if you have any questions concerning this Addendum. The Town's attorney may contact Marc Weiner, Enforcement Attorney, at (303) 312-6913 for any legal matters.

Sincerely,


Julie A. DalSoglio, Director
EPA Region 8 Montana Office


Matt Cohn, Director
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

cc:

John Arrigo, MDEQ
Shelley Nolan, MDEQ
Travis Jones, KLG Engineering
Tina Artemis, EPA Regional Hearing Clerk