

Beaverhead-Jackson Water & Sewer District
PO Box 792
Jackson, MT 59736
November 16, 2014

2015 JAN 12 AM 8:27

FILED
EPA REGION VIII
HEARING CLERK

Tina Artemis, 8RC
Regional Hearing Clerk(8RC)
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202

Dear Tina:

Answer to Count 1: Failure to submit compliance plan and schedule within 60 days of receiving order.

The Board was unsure of what path to take regarding EPA order. Former Clerk had become ill and was not getting info to board. New Clerk was appointed and took some free classes in Missoula to try and figure out what should be done. No one on the board had ever had to deal with an EPA Order and needed to get an engineer hired to help with the Compliance Plan and Schedule for the System to come into compliance with the arsenic MCL. We are a small town (17) with very few resources. At the time we were also having tremendous problems with the sewer system and all our finances were being used up just trying to keep it going, and keep the sewage from running out the top of the tank. Our resources were drained (both financially and physically) and it was very difficult to address our water problems.

Answer to Count 2: Failure to Submit revised preliminary engineering report within deadline:

Partly a miscommunication between the district and the engineers and partly because there has been a difficulty in finding a suitable treatment when dealing the combination of hot water, arsenic, and then the added radio nuclei's. We have had nothing but troubles and setbacks since the beginning of this process. The district voted on their preferred option, in the revised PER, at the January 30th 2014. District voted on the recommended Option 2A New Groundwater Well. The Engineer was present at the meeting, but sent me (Jeanette Robertson) an email on March 17 ask what action the board had decided to take. Now we are waiting for RD's Engineers to take whatever action they need to on the PER, and until they do we have our hands tied. The board is not trying to be difficult or defiant but this is a very difficult situation for the board. The board is not only dealing with EPA, but the community (the water users and they all against treating the water or changing the source, the board does not have the backing of a single resident with regards to the treatment of the water they are drinking and "do not feel anyone should be telling them what they can drink." That is a direct quote from a consumer at one of our meeting.

[Recipient Name]

December 8, 2014

Page 2

Answer to Count 3: Failure to timely consumer confidence reports.

The current clerk was not involved in 2007, but did send the CCR for 2007 out in 2010. The 2010 CCR was sent but we failed to provide a copy to EPA. The 2012 and 2013 CCR were sent out late, again we have very little resources and very little man power. Everyone involved with the Jackson Water & Sewer District is a volunteer, we all have fulltime jobs and must pre-form our duties on our time after hours and on weekends. There should also be training available for districts so they don't have to learn by trial and error when they end up under administrative order. All the people with all the these agency's involved do this for a living, ever day as their job, again we are all volunteers, who have other full time jobs, and have to find personal time to complete these tasks. It is extremely difficult to keep up with all the paperwork. But we are trying and will continue to do all we can to keep up with these duties.

Sincerely, 

Beaverhead-Jackson Water & Sewer Board
Tom Dawson
President