



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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Ref: ENF-W

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Jim Hudson  
Hudson Trusts, LLP  
808-106 Avenue NE #104  
Bellevue, WA 98004

Re: Administrative Order Addendum  
River Grove Estates Trailer Park  
Docket No. SDWA-08-2007-0045  
PWS ID #MT0000123

Dear Mr. Hudson:

This Addendum to the Administrative Order issued July 2, 2007, to Hudson Trusts, LLP, owner of the River Grove Estates Trailer Park water system (the System), incorporates into the Administrative Order the schedule for treatment and modifications as outlined in the plans provided by Jason Eastwood of American Water Technologies, on behalf of the River Grove Estates Trailer Park public water system. These plans and specifications were approved by the Montana Department of Environmental Quality on November 1, 2007. In addition to serving as the Addendum to the July 2, 2007 Administrative Order, this letter constitutes EPA's written approval of the schedule set forth in this Addendum. Each deadline in the schedule will be enforceable as if it were part of the Administrative Order itself.

The following schedule lists the action to be taken, deadline date, and completion date if applicable.

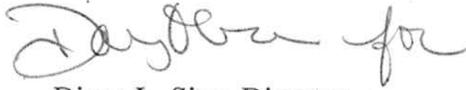
<u>Action</u>	<u>Deadline</u>	<u>Completion</u>
Submit to EPA and the State detailed plans for bringing the System into compliance with maximum contaminant levels (MCL) for nitrate.	September 2, 2007	August 27, 2007  Revised Plans submitted November 14, 2007
Complete proposed maintenance and upgrades as outlined in compliance plan including:	December 15, 2007	
<ul style="list-style-type: none"> <li>• Installation of (2) new well pumps for proper flow rate feed rates.</li> </ul>		October 5, 2007
<ul style="list-style-type: none"> <li>• Perform resin sampling. Flush and brine anion resin sample and test in house and confirm with certified lab results.</li> </ul>		October 5, 2007
<ul style="list-style-type: none"> <li>• Regeneration and back flushing of media with re-pressurized water and saturated brine solution. Will accomplish upon start-up.</li> </ul>		
<ul style="list-style-type: none"> <li>• Replacement of check valves, solenoid valve, ball valves, flow restrictor, and possibly aquamatic valves for proper pressure and flow.</li> </ul>		
<ul style="list-style-type: none"> <li>• Replace and order extra solutions for automatic chlorine analyzer.</li> </ul>		October 5, 2007
<ul style="list-style-type: none"> <li>• Installation of outlet manifold adapters for each anion and cation unit.</li> </ul>		

**Action****Deadline****Completion**

- Replacement of duplex alternating control valves including water flow meters, check valves, drain flow restrictors, and alternate source controls for treated water during regeneration for all four units due to potential scaling/fouling, lack of proper service/repair by original equipment provider.
- Replacement of chlorine feeder and service current as a back up feeder.
- Installation of pressure relief valves(s) and vacuum breakers on the new controls for protection of control valves and filter tanks.
- Replacement of inline flow meter to maintain proper pressure and flow for filtration.
- Installation of duplex water softener on re-pressurized service line to feed water softeners and anion units during regeneration for proper flow and pressure and to allow the wells and treatment train to continue to filter water.

Please be advised that Hudson Trusts, LLP is required to comply with all provisions of the Administrative Order. Penalties for failing to comply are set forth in the Order. Please contact Kimberly Pardue Welch at (303) 312-6983 if you have any questions concerning this Addendum. If you are represented by an attorney, please ask your attorney to call Amy Swanson at the above 800 number, extension 6906, or at (303) 312-6906.

Sincerely,



Diane L. Sipe, Director  
Technical Enforcement Program  
Office of Compliance, Enforcement,  
and Environmental Justice



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

cc:

Bernard F. Hubley, Hughes, Kellner, Sullivan & Alke, PLLP  
Jenny Chambers, MT DEQ  
Kate Miller, MT DEQ  
Jerry Burns, MT DEQ

