



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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2008 JAN -8 PM 12:50

Ref: ENF-W

JAN - 8 2008

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mayor Rick Scheele  
The Town of Darby  
P.O. Box 37  
Darby, MT 59829

Re: Administrative Order Addendum  
Docket No. SDWA-08-2007-0021  
PWS ID #MT0000195

Dear Mayor Scheele:

This addendum to the Administrative Order issued March 7, 2007 to the Town of Darby incorporates the plans for installation of the treatment system for the Town of Darby water system (the System) outlined in the Optimum Corrosion Control Treatment (OCCT) Plans entitled "Darby Water System Optimum Corrosion Control Treatment Plan" and "Darby Water System Optimum Corrosion Treatment Plan Addendum No. 1", which the Environmental Protection Agency (EPA) received on July 5, 2007 and July 31, 2007 respectively, from Kadrmas, Lee & Jackson, Inc. on behalf of the Town of Darby. These two OCCT plans were granted approval by the Montana Department of Environmental Quality (MDEQ) on August 15, 2007. Additionally, Kadrmas, Lee & Jackson, Inc. submitted the "Town of Darby Corrosion Control Treatment Pilot Study Design Report, Plans, and Specifications" to EPA on September 28, 2007, which MDEQ approved on November 26, 2007.

This letter constitutes the written approval by EPA of the schedule set forth in this Addendum. Upon further review and discussions between Mayor Scheele, Nate Robbins, Bradley Koon, and Kimberly Pardue Welch of EPA, it has been determined that the deadlines proposed in the July 26, 2007 "Darby Water System Optimum Corrosion Treatment Plan Addendum No. 1" are no longer attainable and therefore shall be extended as laid out in this Addendum. The effect of today's approval is to extend the final completion date for the OCCT plan from July 2008 (as outlined in the Administrative Order on page 8, paragraph 6) to November 2008 and to incorporate the following schedule into the Administrative Order. Each deadline in the schedule will be enforceable as if it were part of the Administrative Order itself. The System is responsible for notifying EPA of any delays with regard to this schedule.

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

<u>Action</u>	<u>Deadline</u>	<u>Completion (if applicable)</u>
Submit OCCT plan to EPA and MDEQ for review and approval.	July 7, 2007.	July 5, 2007 (OCCT Plan) July 26, 2007 (OCCT Plan, addendum No. 1).
Submit to EPA and MDEQ for approval design reports, plans and specifications from a professional engineer for the OCCT pilot study.	September 1, 2007.	September 28, 2007.
Obtain chemical feed equipment (pumps) and storage tank for feeding orthophosphate and sodium hypochlorite at well No. 1 as well as required testing equipment.	January 15, 2008.	
Install and secure all pilot equipment within existing well No. 1 pump house. Begin chemical feeding operations.	January 15, 2008.	
Conduct full scale testing for lead, copper, pH, alkalinity, calcium, conductivity, temperature, and orthophosphate residual at well No. 1 and two residential test sites. Report results to EPA within 10 days of receiving results.	By February 1, 2008 and every two weeks thereafter until either copper results are below the action level of 1.30 mg/L at each test site or for a test period of two months.	

If the orthophosphate treatment is ineffective or the cost exceeds the benchmark cost of \$0.20/1,000 gallons, the PWS will order and set up treatment using another form of orthophosphate or sodium hydroxide (aka caustic soda).

Immediately upon determining that orthophosphate is ineffective or the cost is determined to exceed the benchmark cost of \$0.20/1,000 gallons of water.

Conduct full scale testing for lead, copper, pH, alkalinity, calcium, conductivity, temperature, and caustic soda residual (or alternate form of orthophosphate) at well No. 1 and two residential test sites. Report results to EPA within 10 days of receiving results.

Within 15 days after caustic soda chemical feed begins and every two weeks thereafter until either copper results are below the action level of 1.30 mg/L at each test site or for a test period of two months. If within two months the copper levels in the treated water are not below the action level of 1.30 mg/L or the cost of treatment exceeds that of the orthophosphate treatment, the System will revert back to the original orthophosphate treatment (provided it was successful in controlling the copper levels).

Once the copper results are below the action level of 1.30 mg/L at the designated test sites, test all other sampling sites (total of 20). Report results to EPA and MDEQ within 10 days of receiving results.

Within two weeks of determining the treatment has achieved copper results below the action level for each test site.

Complete OCCT pilot study and transfer and install current equipment into new permanent treatment facility.

October 31, 2008.

New permanent treatment facility is completely installed and correctly operating with corrosion control treatment.

November 29, 2008.

Monitor the water for lead and copper as required by the drinking water regulations. Report results to EPA and MDEQ within 10 days following the end of the monitoring period.

Between January – June 2009 and again between July – December 2009 and according to the regulations thereafter.

Monitor the water for water quality parameters (WQPs) as required by the drinking water regulations. Report results to EPA and MDEQ within 10 days following the end of the monitoring period.

Between January – June 2009 and again between July - December 2009 and according to the regulations thereafter.

Notify EPA and MDEQ in writing of completion of new treatment plant and permanent optimal corrosion control treatment installation.

Within one week of project completion.

Please be advised that the Town of Darby 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 Peggy Livingston at the above 800 number, extension 6858, or at (303) 312-6858.

Sincerely,



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



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

cc:

Brad Koon, Kadrmas, Lee & Jackson (via Certified Mail w/ return receipt)  
Nate Robbins, Town of Darby  
Autumn Coleman, Lead and Copper Rule Manager, MDEQ  
John Arrigo, MDEQ  
Kate Miller, MDEQ

