

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE FEDERAL BUILDING, 10 W. 15th STREET, SUITE 3200 HELENA, MONTANA 59626 MA REGION WA

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward F. Parisian, Director Rocky Mountain Regional Bureau of Indian Affairs 316 N 26th Street Billings, MT 59101

> Re: Administrative Order Addendum Docket No. SDWA-08-2011-0064 Bureau of Indian Affairs Crow Agency (TP01) Public Water System PWS ID #083090011

Dear Regional Director Parisian:

Pursuant to paragraph 22 of the Amended Administrative Order (AAO) issued April 17, 2012, to the Bureau of Indian Affairs (BIA) regarding the Crow Agency water treatment plant (System), this Addendum to the AAO incorporates the schedule for completing system modifications as outline in the May 15, 2012, letter to EPA from Vianna Stewart, BIA Superintendent, on behalf of the BIA. This letter constitutes the written approval by EPA of the BIA's schedule as indicated in the chart below. In addition to serving as approval for the schedule, this letter serves to incorporate it into the AAO, meaning each deadline and required action in the schedule will be an enforceable part of the AAO.

Action	Deadline	Completion Date
Operators will install new chart recorders	N/A	Installation complete 5/15/12
Operators will submit the continuous chlorine analyzer chart, both individual filter turbidity recording charts, and the combined effluent turbidity recording chart weekly to EPA until notified otherwise by EPA	Beginning 5/15/12	Ongoing Weekly until further notice
Operators will indicate on each monthly surface water treatment rule (SWTR) report whether the turbidity from an individual filter exceeded 1.0 NTU or 2.0 NTU for 15 minutes or greater and report the filter number, the date, and the cause (if known) to EPA.	Beginning 5/15/12	Due to EPA by the 10th day of the following month
Operators will indicate on each daily chart whether the water was being sent to waste or the clearwell during a high turbidity event. If the chart recorded for that day does not clearly indicate when the water is being sent to waste, it shall be presumed that the high turbidity water was sent	Beginning 5/15/12	Due to EPA by the 10 th day of the following month until further notified by EPA

to the clearwell. If high turbidity water is sent to the		
clearwell, EPA must be notified in the monthly report.		
Operators must notify EPA within 24 hours if combined filter effluent turbidity of 1 NTU or greater is recorded.	Beginning 5/15/12	On-going
Operators will monitor chlorine residuals and keep at or above 1.0 for adequate disinfection.	Beginning 5/15/12	On-going
Operators will notify EPA within 24 hours if water with chlorine residual below 0.2 mg/L is sent out to the distribution system.	Beginning 5/15/12	On-going
Operators will notify EPA within 24 hours if the water's chlorine residual is below 0.2 mg/L and it lasts more than 4 hours (This is a treatment technique violation). If the chlorine daily chart recording does not indicate that the plant was shut off during a recording of low chlorine residual, it shall be presumed that the low chlorine water was sent to the distribution system.	Beginning 5/15/12	On-going
Operators will monitor the chlorine analyzer, compare results with grab sample chlorine results each month, and if necessary, re-calibrate the analyzer monthly.	Beginning 5/15/12	On-going
Operators will maintain equipment on or before the 10 th of each month.	Beginning 5/15/12	On-going
Operators will record the lowest chlorine residual value each day and report it to EPA on the monthly SWTR report as the daily lowest value. As indicated above, if the chlorine residual is below 0.2 mg/L and the water is sent to distribution, EPA must be notified within 24 hours.	Beginning 5/15/12	Due to EPA by the 10 th day of the following month
The Operators will calibrate the turbidimeters for measuring individual filter turbidity (IFT) on or before the 10 th of each month. The correct flow rate through the turbidimeter shall be maintained at 300-400 mls/min.	Beginning March 29, 2012	IFT calibrated on or before the 10 th of each month On-going
The Operators will clearly mark IFT charts to show the correlation with each filter's status as operating or not.	Beginning March 29, 2012	On-going
The Operators will clearly mark the IFT charts to show notes with exact times when backwashing, sending water to waste, or to the clear well by filter number.	Beginning March 29, 2012	On-going
The Operators will mark all charts to show plant start-up and shut off times.	Beginning March 29, 2012	On-going
The Operators will record the maximum (span) value on each chart.	Beginning March 29, 2012	On-going
The Operators will take TOC samples each quarter.	Beginning 5/15/12	On-going

Please be advised that the BIA is required to comply with all provisions of the AAO and this Addendum. Penalties for failing to comply are set forth in the AAO. Please contact Sienna Meredith at 1-866-457-2690, extension 5026 or (406) 457-5026. If you are represented by an attorney who has

questions, please ask your attorney to contact Jean Belille, Enforcement Attorney, at 1-800-227-8917, extension 6556 or (303) 312-6556 or at the following address:

Jean Belille Enforcement Attorney U.S. EPA, Region 8 (8ENF-L) 1595 Wynkoop Street Denver, Colorado 80202-1129.

We urge your prompt attention to this matter.

Sincerely,

James H. Eppers, Supervisory Attorney

Legal Enforcement Program

Office of Enforcement, Compliance

and Environmental Justice

Julie A. DalSoglio, Director

EPA Region 8 Montana Office

cc: Cedric Black Eagle, Chairman

Leroy Cummins, Facility Manager, BIA Crow Agency

Bruce Ward, Engineer, BIA Rocky Mountain Region

Vianna Stewart, Superintendant, BIA

Chris Dillon, Acting Manager Apsalooke Water and Wastewater Authority

Jim Real Bird, Apsalooke Water and Wastewater Board

John Doyle, Apsalooke Water and Wastewater Board

Larry Kindness, Apsalooke Water and Wastewater Board

Tina Artemis, EPA 8 Regional Hearing Clerk