



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
DENVER, COLORADO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

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EPA REGION VIII  
HEARING CLERK

JAN 15 2016

Ref: 8ENF-W

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

PacifiCorp Energy  
c/o Tim Swain, Managing Director  
Dave Johnston Plant  
1591 Tank Farm Road  
Glenrock, Wyoming 82637

Re: Administrative Order Addendum, Dave Johnston Plant/PacifiCorp Energy,  
PWS ID #5600291, Docket # SDWA-08-2015-0053

Dear Mr. Swain:

This letter is an Addendum to the Administrative Order (Order) issued on September 30, 2015, to PacifiCorp Energy (PCE). The purpose of this letter is to approve the schedule from PCE to the EPA dated December 22, 2015, for coming into compliance with the total trihalomethane (TTHM) maximum contaminant level (MCL). The schedule is hereby incorporated into the Order per paragraph 8 (page 2) of the Order.

<u>Actions</u>	<u>Completion Date</u>
Benchmark/investigative monitoring of total organic carbon (TOC) TTHM to establish baseline for precursor and TTHM reduction verification	10/28/15 (completed)
Replace granular activated carbon (GAC) filter with upgraded model	10/17/15 (completed)
Create and implement preventative maintenance (PM) orders for GAC backwashing, filter media replacement, and system monitoring	12/18/15 (completed)
Review existing treatment system to determine if additional controls/procedural changes are necessary for adequate turbidity removal	11/25/15 (completed)
Contingent upon above review, install controls/change procedures	addendum date+60 days
Perform initial jar testing on influent raw water to determine adequate coagulant dosage and establish quarterly jar testing of plant effluent	11/17/15 (completed)
Monitor TOC to verify new GAC filter performance and PM schedule	06/30/16

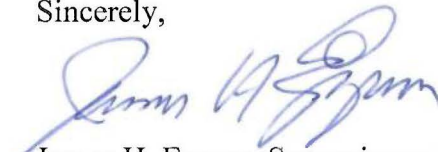
<u>Action</u>	<u>Completion Date</u>
Determine if chlorine injection location is optimal for disinfection contact time and minimization of disinfection byproduct (DBP) formation	01/29/16
Modify chlorine injection system as needed based upon above review	addendum date+120 days
Monitor system modification effects on DBP precursors and formation; verify adequate PM and that DBPs controlled during warmest months	addendum date+210 days
Contingent upon above, obtain WYDEQ permit approval for additional controls or system modifications	addendum date+300 days
If required, implement additional controls, system modifications, and PM schedule adjustments	addendum date +360 days

Pursuant to paragraph 11 of the Order, the System shall achieve compliance with the TTHM MCL within 1 year/365 days of this Addendum's approval date. The EPA is authorized to seek penalties if these deadlines are not met. If PCE has a reasonable basis to believe it may be unable to meet any deadline in the schedule, it shall notify the EPA well in advance of the scheduled deadline to request an extension. The EPA may, in its discretion, consider granting an extension.

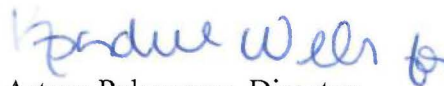
As a reminder, you are required to provide the EPA with quarterly progress reports.

Please contact Kathelene Brainich, Environmental Protection Specialist, at (303) 312-6481 or via email at [brainch.kathelene@epa.gov](mailto:brainch.kathelene@epa.gov) if you have any questions concerning this Addendum.

Sincerely,



James H. Eppers, Supervisory Attorney  
 Legal Enforcement Program  
 Office of Enforcement, Compliance  
 and Environmental Justice



Arturo Palomares, Director  
 Water Technical Enforcement Program  
 Office of Enforcement, Compliance  
 and Environmental Justice

cc: Anne Prettyman, PacifiCorp (via email)  
 WY DEQ/DOH (via email)  
 Tina Artemis, EPA Regional Hearing Clerk