



REGION 8

DENVER, CO 80202

March 21, 2024

FILED

3/25/2024

9:50 AM

**U.S. EPA REGION 8
HEARING CLERK**

Ref: 8ENF-W-SD

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hirst Applegate Registered Agent Services, Inc.
c/o: Tata Chemicals (Soda Ash) Partners
1720 Carey Ave Ste 400
Cheyenne, Wyoming 82001

Subj: Administrative Order Addendum, Tata Chemicals (Soda Ash) Partners regarding
Tata Chemicals (Soda Ash) Partners Public Water System, PWS ID #WY5600636
Docket # SDWA-08-2020-0024

Hirst Applegate Registered Agent Services, Inc.:

This is an Addendum to the Administrative Order (Order) issued to Tata Chemicals (Soda Ash) Partners (Company) on April 22, 2020. The purpose of this letter is to approve the Company's February 15, 2024, schedule (Schedule) for coming into consistent compliance with the trihalomethanes (TTHMs) and haloacetic acids (HAA5s) maximum contaminant level (MCL). The Schedule is hereby incorporated into the Order pursuant to paragraph 18. Each milestone and deadline specified below is an enforceable provision of the Order.

Milestone	Deadline	Projected Cost
Begin Construction of new chlorine gas injection building	February 19, 2024 (reported as completed)	N/A
Complete Construction of new chlorine gas building	March 29, 2024	N/A

Within 10 calendar days of completing all steps included in the above Schedule, please notify the EPA of the project's completion as required by the Order. The Order also requires the Company to achieve and maintain compliance with the TTHMs and HAA5s MCL by the final date specified in the approved Schedule. The EPA is authorized to seek penalties if these deadlines are not met.

If the Company has a reasonable basis to believe it may be unable to meet any deadline in the Schedule, it must 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, the Company is required to provide the EPA with quarterly progress reports by April 1, 2024.

EPA will review subsequent sampling data to determine if moving the chlorine injection point to a new location was sufficient to lower the TTHM and HAA5 concentrations to lead to compliance with the running annual average MCLs and determine if an additional plan and schedule is needed.

If you have any questions or to request an informal conference with the EPA, please contact Jessica Moore via email at moore.jessica@epa.gov, or by phone at (800) 227-8917, extension 6441, or (303) 312-6441. Any questions from the Company's attorney should be directed to Matt Castelli, Senior Assistant Regional Counsel, via email at castelli.matthew@epa.gov or by phone at (800) 227-8917, extension 6491, or (303) 312-6491.

Sincerely,

Colleen Rathbone, Manager
Water Enforcement Branch
Enforcement and Compliance Assurance Division

cc: WY DEQ/DOH (via email)
Sweetwater County Commissioners
EPA Regional Hearing Clerk (r8_hearing_clerk@epa.gov)
Ben Farnham, Senior Environmental Engineer
Roger Hoops, Vice President of Manufacturing
Scott Horgen, Senior Environmental Engineer
Jacob Cress, Tata Chemicals
Jon Conrad, Tata Chemicals
Mark Baron, District Engineer