



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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2008 JUL 14 PM 3:10

EPA REGION VIII  
HEARING CLERK

Ref: 8 ENF-W

JUL 14 2008

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Town of Dixon  
Attn: Matthew Feldmann, Mayor  
POB 26  
Dixon, WY 82323

RE: Emergency Administrative Order  
Town of Dixon  
Docket No. SDWA-08-2008-0060  
PWS ID #5600059

Dear Mayor Feldmann:

On May 22, 2008, the US Environmental Protection Agency (EPA) issued an Emergency Administrative Order (the order), Docket No. SDWA-08-2008-0060, ordering the Town of Dixon (the town) to take various measures in response to high levels of turbidity in the town's drinking water supply.

The order required the town to issue a public notice and boil order, and to continue the notice until receiving notification from EPA to suspend it. This letter confirms the verbal notice provided by Kathelene Brainich of EPA on July 2, 2008 that EPA hereby suspends the "Boil Order and Public Notice" section of the order (part B, pages 4-6), because the turbidity in the town's water supply no longer presents an imminent and substantial endangerment. It is EPA's understanding that the Town has cleaned and flushed the contact chamber, storage tank, wet well, and distribution system as required in the order.

The remainder of the order remains in effect. The town must immediately begin complying with the sampling requirements of part F.1 on page 8 of the order. In addition to the ongoing monitoring required by the Surface Water Treatment Rules (SWTR) (daily turbidity sampling of the filtered water, daily point of entry monitoring of chlorine residual leaving the 20,000 gallon contact tank, and monitoring the chlorine residual when taking samples for the Total Coliform Rule), the town shall collect daily (one sample per day) special purpose total coliform samples of the water in the distribution system and record each sample's turbidity and chlorine residual levels on the lab slip. Special daily total coliform, turbidity and chlorine

residual monitoring shall be conducted until receipt of written notice from EPA that it may be discontinued, at which time the town will be required to begin weekly special sampling. All daily and weekly monitoring and sampling results shall be reported to EPA by telephone or fax immediately upon receiving the results. EPA will notify the town when the weekly special sampling is no longer required.

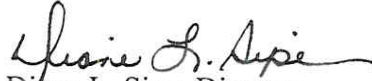
Additionally, the town must comply with the following interim measures upon receipt of this letter. EPA will also incorporate these measures into the separate Administrative Order, docket number SDWA-08-2006-0046, issued to the town on June 27, 2006, as interim measures until the town's treatment plant is completed next year:

- a) Chlorine residual leaving the 20,000 gallon contact tank shall be maintained at no less than 1.0 milligrams per liter (mg/L) whenever the finished water turbidity level is above 1 nephelometric turbidity unit (NTU) and shall be documented on the SWTR report submitted to EPA each month.
- b) Within 10 days of receipt of this letter, a second pressure gauge shall be installed so that incoming and outgoing pressure to the bag filters can be determined daily, and recorded on the monthly SWTR form, along with the daily pressure differential, for submission to EPA. The town must also replace the bag filters at the frequency recommended by the manufacturer based upon the pressure differential, and note when each filter replacement occurs on the monthly SWTR form.
- c) Raw water turbidity before the filters must be measured and recorded daily to anticipate problems. If the raw water turbidity is 10 NTU or higher the town must contact EPA immediately.
- d) If it is necessary to add alum to the treatment system, alkalinity of the raw water will first be determined. For each 1 mg/L of alum needed, the town shall ensure that there is at least 0.5 mg/L of alkalinity. Chemical addition may be needed to increase alkalinity to achieve this ratio; the earlier failure of the alum to help reduce turbidity from the multi-media roughing filter was possibly due to this ratio not being achieved.

Please note that on page 9 item G, the emergency order requires the town to "give daily updates to EPA on progress until EPA notifies the System that reports may be discontinued." The Town has failed to provide daily progress updates to EPA and has therefore violated the order. The town shall immediately initiate daily contact with EPA (via telephone call, email or fax) to report monitoring results, progress and next steps even when the plant is not running.

If you have any questions you may contact Kathelene Brainich at 1-800-227-8917, extension 6481 or (303) 312-6481 or Melanie Wasco at extension 6540 or (303) 312-6540.

Sincerely,



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



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

cc: WY DEQ/DOH (via e-mail)