

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8** 

1595 Wynkoop Street DENVER, CO 80202-1129 Phone 800-227-8917 http://www.epa.gov/region08 2007 MAY 24 AM 8: 27

EPA REGION VID HEARING CLERK

Ref: 8ENF-W

MAY 2 4 2007

## CERTIFIED MAIL LETTER RETURN RECEIPT REQUESTED

The Sinclair Companies c/o R. E. Holding, President East Lincoln Highway Sinclair, WY 82334

Sinclair Wyoming Refining Company c/o P.D. Fritz, Refinery Manager P.O. Box 277 Sinclair, WY 82334

> Engineering Evaluation/Plan Approval Administrative Order Addendum Docket No. SDWA-08-2007-0009 PWS ID #WY5601550

Dear Messrs. Holding and Fritz:

This addendum to the Administrative Order (Order) issued November 27, 2006 to the Sinclair Companies, owner of the Sinclair Refinery Golf Course Public Water System (PWS), constitutes the written approval by the United States Environmental Protection Agency (EPA) of the proposed action plan dated February 23, 2007, and received at EPA on February 26, 2007, incorporating the proposed schedule submitted by the Sinclair Wyoming Refining Company. A copy of the approved schedule prepared by Trihydro Corporation on behalf of Sinclair Wyoming Refining Company is outlined in Table 1 and enclosed in this mailing. The schedule for implementing and completing improvements (all items listed in Table 1) will be incorporated into the November 2006 Administrative Order per paragraph 4 (page 6) of the Order section. Please note that the Sinclair Refinery Golf Course PWS is required to submit quarterly reports to EPA on the progress made toward bringing the system into compliance beginning 4 months after EPA's plan approval. However, due to the timing of the project, EPA requests that the first report be submitted by July 10, 2007. The reports shall thereafter be due within 10 days of the end of each calendar quarter, according to paragraph 5 (page 7) of the Order section.

Regarding the measure in Table 1 pertaining to treated water storage, it is not required under



the Order that EPA approve any treated water storage plan. However, keep in mind that there may be other state and/or local authorizations required, and therefore you should contact the Wyoming Department of Environmental Quality prior to commencing construction.

Additionally, in the February 2007 Engineering Evaluation, there are some inaccuracies concerning details about EPA requirements in regards to bag filter technology on pages 2, 3, and 7 of the engineering evaluation. Specifically, EPA recommends (but does not require) that the water going into bag filters (the <u>influent</u>) be less than 5 Nephelometric Turbidity Units (NTUs) in order for the bags to work properly. However, EPA regulates the water leaving the bags, or the <u>effluent</u>, and the regulations require that the turbidity levels of representative samples of the System's filtered water must be less than or equal to 1 Nephelometric Turbidity Unit (NTU) in at least 95 percent of the measurements taken each month when bag filtration is used, never to exceed 5 NTU. Please note that influent and effluent has been incorrectly interchanged in a few instances throughout the evaluation.

Please contact Melanie Wasco, Environmental Protection Specialist, at (303) 312-6540 if you have any questions concerning this Addendum.

Sincerely,

Lliane 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

## Enclosure

cc: Doug Smith, Operator (certified mail) Sinclair Refinery Golf Course

> Corporation Service Company (certified mail) Registered Agent, Sinclair Companies

Wyoming DEQ & DOH (via email)

Table 1: Proposed Implementation Schedule

Description	Milestones	Schedule of Implementation	Frequency
SCADA	<ol> <li>Develop scope of work, brief specifications, and informal bid</li> <li>Commence upgrades</li> <li>Start-up testing and operator training</li> </ol>	April 18, 2007 June 18, 2007 July 13, 2007	
Refresher PWS Training	Continuing education is required for each operator to maintain licensure	Ongoing	Annual
Communication	WTP operator-supervisor meeting to review monitoring and reporting requirements for turbidity and chlorine residual	March 7, 2007	Annual Refresher
	<ol> <li>Formalize shift turnover meetings by incorporating meeting minutes in the daily operator's log</li> <li>Recordkeeping and historizing data (via SCADA)</li> </ol>	March 14, 2007  July 13, 2007	
Refresher O&M	Investigate on-site training and costs with	March 9, 2007	
Training	US Filter/Siemens 2. Procurement 3. Training	April 16, 2007 July 31, 2007	Annual Refresher
Treated Water Storage	Develop design and brief specifications     Submit Plan to EPA for approval     Commence installation	March 30, 2007 April 16, 2007	
	Commission tank	July 31, 2007	
MEMCOR Spare Parts Inventory	Develop recommended spare parts list     Procurement     Append list to O&M Manual	March 20, 2007 April 18, 2007 May 1, 2007	
SOP and O&M manual changes	Third party WTP inspections, interviews, and witness operation     Submit draft SOP/O&M manual revisions and checklists (or alternatives)	April 3-4, 2007 May 1, 2007	Update as needed
	3. Review by SWRC  4. Finalize SOP and O&M manual  5. Train operators on SOP and O&M manual	May 23, 2007 June 30, 2007 July 31, 2007	