

From: [HertzWu, Sara](#)
To: chrisgalluslaw@gmail.com
Cc: [Kleffner, Erin](#)
Subject: RE: ADAMAS Reply Lame Deer Lagoon CjG
Date: Friday, June 21, 2019 11:13:00 AM

Chris: Thank you for providing that response. However, the documents requested in the CWA Section 308 letter still need to be provided to EPA. EPA is unable to prove the veracity of the claims you are making regarding the waste without the appropriate documentation. If your client does not have those documents, that response must be provided as well, along with a certification as stated in the 308 letter. Failing to respond to the information request is a separate violation of the Clean Water Act.

Further, the reporting requirements under 40 CFR Part 503 apply to any person who prepares sewage sludge that is applied to the land, to any person who applies sewage sludge to the land, to sewage sludge applied to the land, and to the land on which sewage sludge is applied. See 503.10(a). Therefore, your client should have the required records available to provide to EPA.

Your client also contacted me directly. Because he is represented by counsel, I did not return his call. Unless specifically authorized by you, I will only communicate with him through his counsel. If you are no longer his counsel, please advise.

EPA requests that compliance with the CWA Section 308 letter within 10 days. The original letter was sent 10 months ago and we have yet to receive a response. Your client either possesses the documents or he does not. Either way, a response is required.

If you wish to set up a call to discuss, please let me know.

Regards,

Sara Hertz Wu
Assistant Regional Counsel
EPA Region VII
11201 Renner Boulevard
Lenexa, Kansas 66219
Phone: (913)551-7316
Email: hertzwu.sara@epa.gov
Fax: (913) 551-7925

From: Christopher Gallus <chrisgalluslaw@gmail.com>
Sent: Friday, June 14, 2019 4:48 PM
To: Kleffner, Erin <kleffner.erin@epa.gov>
Subject: ADAMAS Reply Lame Deer Lagoon CjG

Erin,

I apologize, but this is the only manner in which I can provide a response today. When I return to my office I will scan the letter, but the content is the exact same as is being provided here. Thanks, CjG

Chris J. Gallus, Attorney at Law
Law, Elections & Gov't Relations
1423 East Otter Road
Helena, Montana 59602
Ph. 406.459.8676

chrisjgalluslaw@gmail.com

June 14, 2019

Erin Kleffner, Compliance Officer
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Lame Deer Lagoon Desludging and Land Application
Northern Cheyenne Reservation

Dear Ms. Kleffner:

I appreciated receiving your letter of June 11, 2019 regarding my client ADAMAS Construction. We accept your offer to conduct pre-filing negotiations and we are providing you the requested information.

Mr. Pierce has previously responded to EPA Region 8 officials. As you will read, it is the position of ADAMAS that the size of the entity involved excluded 503 regulation, as is being asserted. ADAMAS maintains that it complied with EPA regulations and did not violate any provisions of law. To the extent the EPA determines a violation occurred, as explained, it is not a violation by ADAMAS, for reasons provided herein.

Please find a summary of our position prepared by Mr. Peirce. I will instruct him to complete and send his signed Statement of Certification, if you determine one is required. Mr. Pierce is currently traveling and has limited access to technology. We are happy to discuss this matter at your convenience.

You should be aware that ADAMAS filed a notice to file tort claims against IHS agents connected with this particular project because these agents engaged in retaliatory acts against ADAMAS and Mr. Peirce. Mr. Pierce has also requested Congressional assistance to resolve matters pertaining to the Lame Deer Lagoon Project, and U.S. Senator Steve Daines is assisting Nathan and I in that regard.

That information provided, we understand your agency is separate and apart from IHS and we certainly intend to participate and comply with any of your applicable regulations. As such, we provide the following information and summary pertaining to your request:

SUMMARY:

The land the sludge was applied to was identified in IHS Bid packet BI16N39 and is owned by the Northern Cheyenne Nation and is leased by the Northern Cheyenne Tribal Land Authority to Tom Robinson the leasehold tenant. IHS also gave an estimate of the application rate of the sludge to the land and this information was relayed to Tom before application. It is important to note that Tom Robinson is the Brother-in-Law of IHS construction inspector George Cummings. (Bid Packet, available upon request)

IHS construction inspector George Cummings was on site when sludge was being applied and can confirm details of how and when it was applied and the manner his brother-in-law, Tom Robinson, complied with the 503 regulations. Tom Robinson was the person or persons who applied the sludge to the land using his own equipment and he is the Leasehold tenant of the property.

The sludge was tested by IHS and the Lab Analytical Report was included in the bid packet. According to the Lab Analytical Report the Sludge, the sewage sludge from the Lame Deer Lagoons meets the most stringent limits for all three of the sewage sludge quality parameters and is referred to as Exceptional Quality (EQ) sewage sludge. (See attached Bid Packet and Lab Analytical Report)

According to the 'EPA Land Application of Sewage Sludge - A Guide for Land Appliers on the Requirements of the Federal Standards for the Use or Disposal of Sewage Sludge, 40 CFR Part 503', "EQ sludge is considered comparable to standard fertilizer products. Therefore, land appliers of EQ sewage sludge have no requirements to meet under the Rule." This would seem to be a clear indication that my client has no requirements to meet from the EPA and does not need to meet any requirements for payment of the application portion of the contract. (See attached EPA Land Application Guide, Page 5)

According to 2.8 Reporting (40 CFR 503.18) The reporting requirements under Part 503 apply to major municipal NPDES permittees and Class I Sludge Management Facilities. Major municipal NPDES permittees are publicly owned treatment works (POTWs) with a design flow rate equal to or greater than 1 million gallons per day and POTWs with a service population of 10,000 people or more. Class I sludge management facilities are usually POTWs that are required to have an approved pre-treatment program under 40 CFR 403.8(a), including any POTW located in a State that has elected to assume local pretreatment program responsibilities under 40 CFR 403.10(e). In addition, the EPA Regional Administrator may use his or her discretion to designate other treatment works treating domestic sewage (TWTDS) as Class I sludge management facilities. Land appliers are not TWTDS unless designated as such by the EPA Regional Administrator. In order to have reporting requirements under Part 503, a land applier must be designated both a TWTDS and a Class I sludge management facility.

Neither my client nor the Lame Deer Lagoons qualify as a POTW and are therefore exempt from

reporting under the rule. As such my client should not need to meet any additional requirements for payment of the application portion of the contract. (See EPA Land Application Guide, page 29)

Despite having no requirements to meet under the Rule, my client did relay to Tom Robinson that he should comply with, Vector Attraction Reduction Option 10 (40 CFR 503.33) "Sewage sludge applied to the land shall be incorporated into the soil within 6 hours after application to the land. - When sewage sludge that is incorporated into the soil is Class A for pathogens, the sewage sludge shall be applied to the land within 8 hours after being discharged from the pathogen treatment process." George Cummings IHS Construction inspector also witnessed and ensured this vector attraction reduction option was used.

I appreciate your consideration and your attention to this important matter. Please feel free to call me at your convenience.

Sincerely,

/s/ Chris J. Gallus

Chris J. Gallus
Attorney for ADAMAS Construction

Sent from my iPhone

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From: Christopher Gallus
To: ADAMAS CONSTRUCTION And DEVELOPMENT SERVICES PLLC; HertzWu, Sara
Subject: Re: ADAMAS Reply Lame Deer Lagoon CJG
Date: Friday, June 21, 2019 12:15:30 PM

Sara,

Thank you for the communication. You are specifically authorized by me to communicate with my client Nathan Pierce, or his spouse Michelle, on this matter. As I do continue to represent him I do ask that I be copied and have an opportunity to provide counsel where circumstances permit or necessitate, but Mr. Pierce is a sophisticated client with respect to these matters and direct communication will facilitate having this matter expedited.

Nathan, please provide the documents to Sara and sign any appropriate certifications or authorization. I'm happy to continue to help, but realize cost considerations are a factor. If you have questions please contact me. If you have a conference or meeting involving legal documents or discussions please feel free to include me.

Thank you, both, Chris

On Fri, Jun 21, 2019 at 10:13 AM HertzWu, Sara <HertzWu.Sara@epa.gov> wrote:

Chris: Thank you for providing that response. However, the documents requested in the CWA Section 308 letter still need to be provided to EPA. EPA is unable to prove the veracity of the claims you are making regarding the waste without the appropriate documentation. If your client does not have those documents, that response must be provided as well, along with a certification as stated in the 308 letter. Failing to respond to the information request is a separate violation of the Clean Water Act.

Further, the reporting requirements under 40 CFR Part 503 apply to any person who prepares sewage sludge that is applied to the land, to any person who applies sewage sludge to the land, to sewage sludge applied to the land, and to the land on which sewage sludge is applied. See 503.10(a). Therefore, your client should have the required records available to provide to EPA.

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Regards,

Sara Hertz Wu

Assistant Regional Counsel

EPA Region VII

11201 Renner Boulevard

Lenexa, Kansas 66219

Phone: (913)551-7316

Email: hertzwu.sara@epa.gov

Fax: (913) 551-7925

From: Christopher Gallus <chrisjgalluslaw@gmail.com>

Sent: Friday, June 14, 2019 4:48 PM

To: Kleffner, Erin <kleffner.erin@epa.gov>

Subject: ADAMAS Reply Lame Deer Lagoon CjG

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June 14, 2019

Erin Kleffner, Compliance Officer

U.S. EPA Region 7

11201 Renner Boulevard

Lenexa, Kansas 66219

RE: Lame Deer Lagoon Desludging and Land Application

Northern Cheyenne Reservation

Dear Ms. Kleffner:

I appreciated receiving your letter of June 11, 2019 regarding my client ADAMAS Construction. We accept your offer to conduct prefilings negotiations and we are providing you the requested information.

Mr. Pierce has previously responded to EPA Region 8 officials. As you will read, it is the position of ADAMAS that the size of the entity involved excluded 503 regulation, as is being asserted. ADAMAS maintains that it complied with EPA regulations and did not violate any provisions of law. To the extent the EPA determines a violation occurred, as explained, it is not a violation by ADAMAS, for reasons provided herein.

Please find a summary of our position prepared by Mr. Peirce. I will instruct him to complete and send his signed Statement of Certification, if you determine one is required. Mr. Pierce is currently traveling and has limited access to technology. We are happy discuss this matter at your convenience.

You should be aware that ADAMAS filed a notice to file tort claims against IHS agents connected with this particular project because these agents engaged in retaliatory acts against ADAMAS and Mr. Peirce. Mr. Pierce has also requested Congressional assistance to

resolve matters pertaining to the Lame Deer Lagoon Project, and U.S. Senator Steve Daines is assisting Nathan and I in that regard.

That information provided, we understand your agency is separate and apart from IHS and we certainly intend to participate and comply with any of your applicable regulations. As such, we provide the following information and summary pertaining to your request:

SUMMARY:

The land the sludge was applied to was identified in IHS Bid packet BI16N39 and is owned by the Northern Cheyenne Nation and is leased by the Northern Cheyenne Tribal land Authority to Tom Robinson the leasehold tenant. IHS also gave an estimate of the application rate of the sludge to the land and this information was relayed to Tom before application. It is important to note that Tom Robinson is the Brother-in-Law of IHS construction inspector George Cummings. (Bid Packet, available upon request)

IHS construction inspector George Cummings was on site when sludge was being applied and can confirm details of how and when it was applied and the manner his brother-in-law, Tom Robinson, complied with the 503 regulations. Tom Robinson was the person or persons who applied the sludge to the land using his own equipment and his is the Leasehold tenant of the property.

The sludge was tested by IHS and the Lab Analytical Report was included in the bid packet. According to the Lab Analytical Report the Sludge, the sewage sludge from the Lame Deer Lagoons meets the most stringent limits for all three of the sewage sludge quality parameters and is referred to as Exceptional Quality (EQ) sewage sludge. (See attached Bid Packet and Lab Analytical Report)

According to the 'EPA Land Application of Sewage Sludge - A Guide for Land Appliers on the Requirements of the Federal Standards for the Use or Disposal of Sewage Sludge, 40 CFR Part 503', "EQ sludge is considered comparable to standard fertilizer products. Therefore, land appliers of EQ sewage sludge have no requirements to meet under the Rule." This would seem to be a clear indication that my client has no requirements to meet from the EPA and does not need to meet any requirements for payment of the application portion of the contract. (See attached EPA Land Application Guide, Page 5)

According to 2.8 Reporting (40 CFR 503.18) The reporting requirements under Part 503 apply to major municipal NPDES permittees and Class I Sludge Management Facilities.

Major municipal NPDES permittees are publicly owned treatment works (POTWs) with a design flow rate equal to or greater than 1 million gallons per day and POTWs with a service population of 10,000 people or more. Class I sludge management facilities are usually POTWs that are required to have an approved pre-treatment program under 40 CFR 403.8(a), including any POTW located in a State that has elected to assume local pretreatment program responsibilities under 40 CFR 403.10(e). In addition, the EPA Regional Administrator may use his or her discretion to designate other treatment works treating domestic sewage (TWTDS) as Class I sludge management facilities. Land appliers are not TWTDS unless designated as such by the EPA Regional Administrator. In order to have reporting requirements under Part 503, a land applier must be designated both a TWTDS and a Class I sludge management facility.

Neither my client nor the Lame Deer Lagoons qualify as a POTW and are therefore exempt from reporting under the rule. As such my client should not need to meet any additional requirements for payment of the application portion of the contract. (See EPA Land Application Guide, page 29)

Despite having no requirements to meet under the Rule, my client did relay to Tom Robinson that he should comply with, Vector Attraction Reduction Option 10 (40 CFR 503.33) "Sewage sludge applied to the land shall be incorporated into the soil within 6 hours after application to the land. - When sewage sludge that is incorporated into the soil is Class A for pathogens, the sewage sludge shall be applied to the land within 8 hours after being discharged from the pathogen treatment process." George Cummings IHS Construction inspector also witnessed and ensured this vector attraction reduction option was used.

I appreciate your consideration and your attention to this important matter. Please feel free to call me at your convenience.

Sincerely,

/s/ Chris J. Gallus

Chris J. Gallus

Attorney for ADAMAS Construction

Sent from my iPhone

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Cc: [Kleffner, Erin](#)
Subject: RE: ADAMAS Reply Lame Deer Lagoon CjG
Date: Friday, June 21, 2019 1:57:00 PM

Chris and Nathan: Thank you for your response. The deadline for providing a response to the 308 information request letter is July 2, 2019. If you need another copy of the letter, please let me know.

Regards,

Sara Hertz Wu
Assistant Regional Counsel
EPA Region VII
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Lenexa, Kansas 66219
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Sent: Friday, June 21, 2019 12:15 PM
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Subject: Re: ADAMAS Reply Lame Deer Lagoon CjG

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June 14, 2019

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Lenexa, Kansas 66219

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Northern Cheyenne Reservation

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I appreciate your consideration and your attention to this important matter. Please feel free to call me at your convenience.

Sincerely,

/s/ Chris J. Gallus

Chris J. Gallus
Attorney for ADAMAS Construction

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