

Technical Assistance Record
 Reservation: Northern Cheyenne
 Name: Lame Deer CSS
 EPA NPDES ID: MT0023141

DATE	ASSISTED	ASSISTING
8/28/2018	Northern Cheyenne Utilities Commission	James Courtney, George Cummins

REMARKS

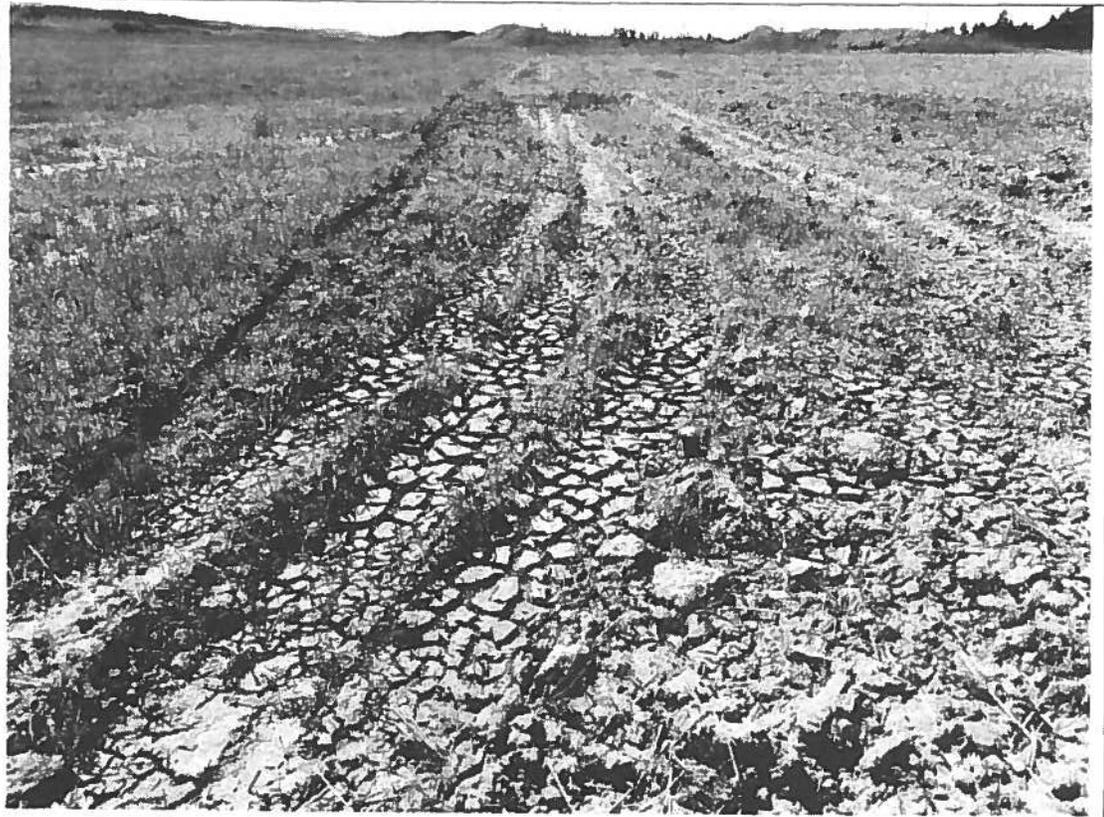
A property owner in Lame Deer, Tommy Robinson (406.647.8312), contacted the IHS on 8/27/2018 to express dissatisfaction with the sludge application on his property from the Lame Deer lagoon desludging operation. He stated that the sludge did not seem appropriately spread during the application and that this made tilling difficult. The subcontractor has also been refusing to provide the target application rates for the sludge, laboratory tests, and application logs.

James Courtney and George Cummins met with the landowner on 8/28/2018 and then visited his property to assess the sludge application. We met two of the utility operators on the property. The operators were also assessing the application and we discussed the apparent deficiencies.

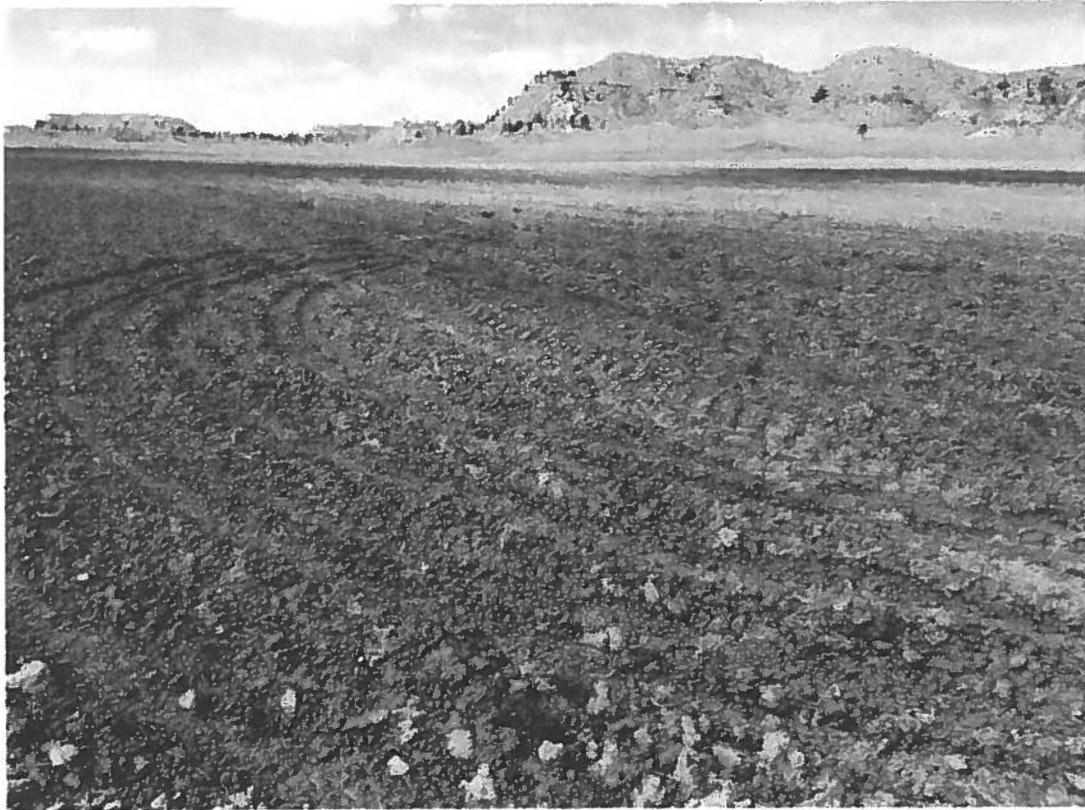
Sludge appeared to be dumped in multiple locations without adequate spreading. In addition, the sludge was likely applied approximately a week before our observations.







Areas where the sludge was not dumped appeared to be very narrowly applied.



The subcontractor performing the sludge removal work, Nathan Pierce from ADAMAS Construction (406.697.3022 / adamas.mt.406@gmail.com / 16550 Cottontail Trail, Shepherd, MT 59079), is currently claiming that the applied sludge is approximately ten times the original concentration of the sludge removed from the lagoon. The observed application appears to be over-applied assuming the sludge was not concentrated.

The property owner stated to IHS that he withdrew consent for the sludge to be applied but that the subcontractor continued to dispose of the sludge on his property on 8/29/2018.

The sludge was hauled by D And R Disposal out of Colstrip, MT (406.205.8151).

Kleffner, Erin

From: Courtney, James (IHS/BIL) <James.Courtney@ihs.gov>
Sent: Tuesday, August 13, 2019 9:32 AM
To: Kleffner, Erin
Subject: RE: Lame Deer Sludge Removal - ADAMAS Construction

Erin,

Yes. Below are photos of the application.







James Courtney, P.E.

LT, USPHS

Environmental Engineer

Billings Area, Indian Health Service

2900 4th Ave., Billings, MT 59101

| P 406.247.7094 | C 406.696.7284 | James.Courtney@IHS.gov

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

Sent: Monday, August 12, 2019 12:03 PM

To: Courtney, James (IHS/BIL) <James.Courtney@ihs.gov>

Subject: RE: Lame Deer Sludge Removal - ADAMAS Construction

James—

Would you happen to have color copies of the photos from the Lame Deer land application complaint?

Thanks,
Erin

From: Courtney, James (IHS/BIL) <James.Courtney@ihs.gov>

Sent: Tuesday, May 14, 2019 7:10 PM

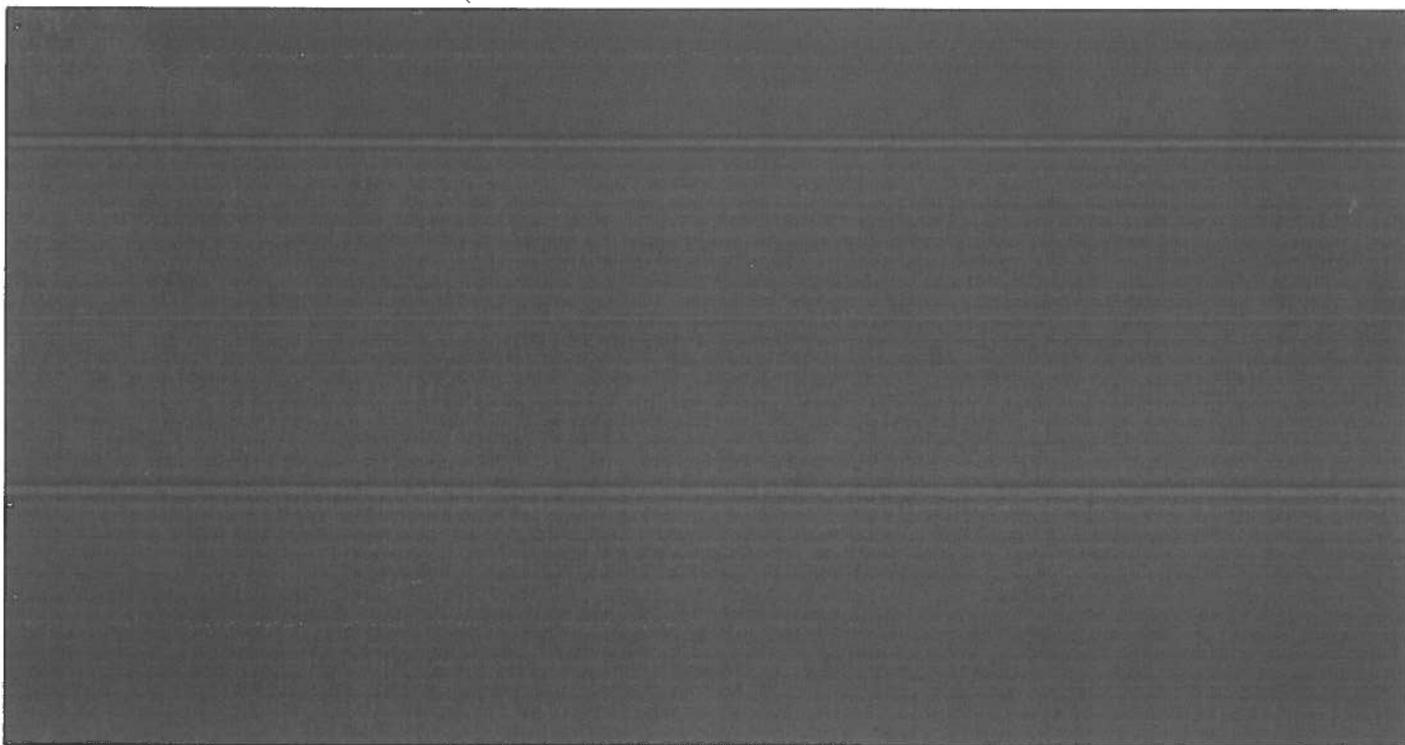
Kleffner, Erin

From: Bruno, Jodi
Sent: Wednesday, September 05, 2018 8:06 AM
To: Kleffner, Erin
Subject: FW: Trip Report for Sludge Application from Lame Deer Lagoon (8/28/18)
Attachments: TA Lame Deer CSS 8-28-18.pdf

Here's the other email.

From: Llamozas, Emilio
Sent: Tuesday, September 04, 2018 12:49 PM
To: Bruno, Jodi <Bruno.Jodi@epa.gov>; Huffman, Diane <Huffman.Diane@epa.gov>
Cc: DeJong, Stephanie <DeJong.Stephanie@epa.gov>; Johnson, Akash <johnson.akash@epa.gov>; Ben-Khaled, Monia <Ben-Khaled.Monia@epa.gov>; Swanson, Amy <Swanson.Amy@epa.gov>
Subject: FW: Trip Report for Sludge Application from Lame Deer Lagoon (8/28/18)

"ATTORNEY WORK PRODUCT, ATTORNEY-CLIENT, ENFORCEMENT SENSITIVE."



Emilio Llamozas
(303) 312-6407 phone
To report an environmental violation, please visit EPA's website at
<http://www.epa.gov/compliance/complaints/index.html>

From: Courtney, James (IHS/BIL) [<mailto:James.Courtney@ihs.gov>]
Sent: Wednesday, August 29, 2018 3:02 PM

To: Llamozas, Emilio <Llamozas.Emilio@epa.gov>

Cc: Swanson, Amy <Swanson.Amy@epa.gov>; Dion Killsback <dkillsback77@gmail.com>; Sheri Bement <bement.sheri@gmail.com>; Ben-Khaled, Monia <Ben-Khaled.Monia@epa.gov>; charlene.aiden@chevennenation.com

Subject: Trip Report for Sludge Application from Lame Deer Lagoon (8/28/18)

Hello Emilio,

Attached is the trip report for yesterday (8/28/18) for the sludge application from the Lame Deer lagoon desludging work.

James Courtney, E.I.T.

LTIG, USPHS

Environmental Engineer

Billings Area, Indian Health Service

2900 4th Ave., Billings, MT 59101

| P 406.247.7094 | C 406.696.7284 | James.Courtney@IHS.gov