CONFIDENTIAL

WEEKLY HOT TOPICS REPORT for RA/DRA Region 8

Week ending June 15, 2018

OFFICE OF ECOSYSTEMS PROTECTION AND REMEDIATION

HOT ISSUES AND IMPORTANT DEADLINES:

BLM Enefit Utility Corridor Project/Final EIS letter/Due July 9, 2018

Key message: Enefit American Oil (Enefit) is requesting five rights of way (ROW) across BLM lands for utilities to service a proposed oil shale mining and retorting operation at their South Project site, located on adjacent non-federal property. The Draft EIS was rated "3-Inadequate" in 2016 and lacked information from Enefit on the South Project design and the expected substantial indirect environmental impacts. Based on additional information in the FEIS, the NEPA Program does not consider this project to be a candidate for CEQ referral.

- Enefit proposes to surface mine and process between 7,000 to 9000 acres (855 million tons) of oil shale at the South Project site with an estimated top production of 50,000 barrels per day for the life of the 30-year project.
- The BLM has qualitatively determined that the South Project is expected to contribute to Uinta Basin wintertime ozone NAAQS exceedances. Enefit declined to provide BLM with engineering and design information for the South Project and as a result BLM was unable to provide quantitative analysis in the FEIS for indirect and cumulative impacts of the South Project.
- The South Project may eventually require air and water permits from EPA because the project is in Indian Country.
- Contact: Phil Strobel (303) 312-6704

Bonita Peak Mining District Superfund Site, San Juan County, CO, Impacts of 416 Fire near Durango on BPMD 2018 work

Key Message: The 416 Fire broke out on June 1. Since then it has expanded to over 32,000 acres and is currently standing at 15% containment. It is likely that this fire will continue for many weeks. Due to the fire Hwy 550 between Durango and Silverton closes periodically and traffic movement through the fire area is restricted. This has resulted in delays getting heavy equipment and lime shipments to the Gladstone IWTP that are necessary for hauling sludge to Kittimac Tailings for interim disposal. As a result, we will transport a smaller amount of sludge on June 15, as originally planned, while we wait for additional equipment. All equipment is expected over the weekend which will allow for a full start on Monday, June 18.

- Kittimac work was planned to be completed in two phases: a pilot phase starting June 15 for 7-10 days, and a larger extended effort starting in mid-September. Due to the access difficulties along Hwy 550, tourism has declined significantly in San Juan County resulting in fewer visitors and less traffic on the Kittimac haul routes. As a result, San Juan County is interested in EPA extending its work this spring to allow for hauling more sludge earlier in the year than originally anticipated. EPA Removal Program is currently working to see if equipment is available and adjust operations accordingly in order to try to accommodate this request.
- As a result of the extreme drought conditions and current fire activity, San Juan National Forest (SJNF) has issued a Stage III fire restriction which effectively closes access to the SJNF until weather and drought conditions permit lifting the restriction. Effectively this closure prevents access across or within SJNF lands for any reason. The BPMD team is currently working to understand what effects of this closure may have on BPMD sampling activities this summer, which are likely to be limited to the Mineral Creek drainage. Likely impacts will be that we will

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need to avoid sampling on SJNF lands, adjust locations where possible to sample on private land instead of SJNF land, and avoid travel to source area locations where it is required to cross SJNF land. This could have an impact on completion of the terrestrial ecological risk assessment and on design work at the Brooklyn Mine. USFS has had to cancel sampling in the Mineral Creek area and will reschedule this sampling at a later date.

- Contact: Christina Progess (303) 312-6009

OFFICE OF ENFORCEMENT, COMPLIANCE & ENVIRONMENTAL JUSTICE

HOT ISSUES AND IMPORTANT DEADLINES:

SDWA Enforcement Issued Two SDWA Emergency Administrative Orders to the Blackfeet Tribe
Key Message: On June 7, 2018, EPA issued 1431 Orders in response to a potential imminent and substantial endangerment at Bedrock Babb Water System (Babb) and Starr School (Star School) Water System located on the Blackfeet Indian Reservation in Montana.

- A resident notified EPA on June 6, 2018, the Starr School was out of water.
- EPA contacted the Blackfeet Solid Waste Management Director and was notified both Systems were completely out of water.
- Babb had a mechanical issue with the well. Starr School experienced an electrical surge, which blew the well pump and drained their finished water storage tank.
- Loss of pressure in a drinking water distribution system may cause backsiphonage, which can allow disease causing organisms to enter the distribution system.
- EPA consulted with the director of the systems to inform him of the requirement to provide an alternative source of water and post/deliver boil water advisory immediately; disinfect and flush the system after making repairs; and the boil advisory must remain in effect until notified by EPA.
- The Babb Water System serves 60 residents; Starr School Water System serves 175 residents.
- The Systems issued public notice (boil water advisory) and are in the process of performing corrective actions.
- Per our EPA protocol, the Water Enforcement Director coordinated with OECA prior to issuing the orders
- Technical Contacts: Jill Minter, 312-6084 (Bedrock Babb Water System); Kathelene Brainich, 312-6481 (Starr School Water System); Management Contact: Tiffany Cantor, 312-6521

SDWA Enforcement Issued an Emergency Administrative Order (EAO) to Town of Cokeville in Lincoln County
Key Message: On June 13, 2018, EPA issued a 1431 order in response to a potential imminent and substantial endangerment at the Town of Cokeville public water system located in Wyoming.

- Lincoln Quality Water Laboratory notified EPA on June 12, 2018, that the System had an E. coli maximum contaminant exceedance.
- E. coli can cause symptoms such as diarrhea, nausea, cramps, headaches, and may pose a greater risk for infants, elderly, and immunocompromised individuals.
- The System is currently serving approximately 535 residents and provides hauled water to 41 individuals at an office building.
- Office of Water Protection proactively provided the operator with a boil order advisory to post.
- EPA has informed the System representative of their requirement to provide an alternative water supply (e.g., bottled water), post a boil water advisory, coordinate with an EPA contractor to conduct a Level 2 Revised Total Coliform Rule Assessment, provide EPA with a plan and

schedule that outlines actions to be taken to prevent the recurrence of future E. coli contamination at the system, and perform the necessary corrective actions.

- Prior to order issuance, EPA consulted with OECA, Wyoming DEQ and Department of Health (includes the State Epidemiologist).
- Technical Contact: Olive Hofstader, 312-6467; Management Contact: Tiffany Cantor, 312-6521

CAA Enforcement Sends Notice of Violation to Kinder Morgan, Inc. Regarding Clean Air Act Noncompliance at the Randlett Booster Station Located on the Uintah and Ouray Indian Reservation

Key Message: Region 8 issued a Notice of Violation (NOV) to Kinder Morgan, Inc. on June 6, 2018:

- The NOV arises out of a Clean Air Act (CAA) inspection of the Randlett Booster Station on September 20, 2017. The inspection included stack testing of two engines located onsite to confirm compliance with the NSPS JJJJ emission limits. The stack test of engine C2 demonstrated that the engine was exceeding the NSPS JJJJ regulatory limit for NOx.
- The Randlett Booster Station is located on the Uintah and Ouray Indian Reservation.
- A tribal inspection notification letter was sent to the Ute Indian Tribe on August 10, 2017.
- Technical Contact: Michael Stovern, 312-6635; Legal Contact: Abigail Dean, 312-6106

Wetlands & OPA Enforcement to Conduct Spill Prevention, Control, and Countermeasures Inspections in Northwest Wyoming

Key Message: The Wetlands & OPA Enforcement will be conducting Spill Prevention, Control, and Countermeasures (SPCC) inspections in Campbell, Niobrara and Weston Counties on June 18-21, 2018.

- The EPA directly implements the SPCC Program in Region 8.
- The purpose of the inspections is to verify compliance with the SPCC requirements, based on the high priority inspection scheme described in the 2013 Targeting Memo from of the Office of Emergency Management. Specific facilities to be inspected will be determined in the field.
- The Wetlands & OPA Enforcement Unit works closely with the Oil Program to conduct SPCC inspections.
- Technical SPCC Contacts: Christopher Ajayi, 312-6320; Dennis Jaramillo, 312-6203 Management Contact: Ken Champagne, 312-6608

OFFICE OF PARTNERSHIPS AND REGULATORY ASSISTANCE

HOT ISSUES AND IMPORTANT DEADLINES:

Next Week

Western Resource Advocates (WRA) Meeting with Region 8

Key Message: Joro Walker with WRA requested a meeting with Region 8's Air Program to discuss the Salt Lake nonattainment area (NAA) SIP and the Clean Air Act (CAA) requirements for the Provo NAA. Jessica Reimer from HEAL Utah is also scheduled to attend the meeting.

- Monica Morales, Scott Jackson and Steve Odendahl are meeting with Ms. Walker and Ms. Reimer the afternoon of June 18, 2018.
- Our last meeting with Ms. Walker and Ms. Reimer was on September 6, 2017. WRA has made it known in the past that they are interested in clean air and emissions reductions to get the NAAs into attainment. So far, they have not expressed concerns regarding Utah meeting CAA deadlines (e.g., attainment SIP for Salt Lake NAA was due December 31, 2017).

- For the meeting, we will listen to WRA and HEAL Utah's concerns and we will clarify the CAA requirements for Provo's Clean Data Determination.
- Contacts: Monica Morales, 312-6936; Scott Jackson, 312-6107; Steve Odendahl, 312-6219

OFFICE OF TECHNICAL AND MANAGEMENT SERVICES
No report

OFFICE OF WATER PROTECTION

HOT ISSUES AND IMPORTANT DEADLINES:

EPA Approves Deviation Request for Santaquin City
Key Message: Santaquin City, UT requested a deviation from property disposition requirements. Region 8 supported this request and the EPA's Office of Grants and Debarment has approved it.

- Santaquin City, Utah sent a request to the EPA dated 2/16/18 requesting a deviation from the property disposition regulations for a Clean Water Act (CWA) construction grant issued in 1991.
- Santaquin constructed a new water reclamation facility on the property in 2011 and proposes to build a roadway on a portion of the property that has an EPA lien stemming from the 1991 grant.
- The deviation will consolidate the EPA's property interest so that the EPA has a 100% interest in the 55% of the total original land acreage still in use for sewer processing rather than a 55% interest in the total original acreage.
- The EPA will lift the federal lien on the remaining 45% of the total original land acreage making possible its use for the roadway.
- There has been Congressional interest in this request. Representatives John Curtis and Mia Love both sent in letters expressing support for this deviation request.
- The EPA's Office of Grants and Debarment approved the request in a memo dated 6/11/18 to EPA Region 8.
- Contact: Jennifer Berig, 312-6262; Rebecca Russo, 312-6757

UPDATE from 5/23: PFAS Contamination at Sugarloaf Fire Protection District in Boulder County
Key Message: On Monday, June 11, the Sugarloaf Fire Protection District received additional PFAS sampling results. Only one of the twelve homes nearest Fire Stations 1 and 2 tested above the EPA Health Advisories for PFOA and PFOS.

- The results at the one home were 210 ppt PFOS and 46 ppt PFOA. This home is near Station 1, where levels were 1200 ppt PFOS and 82 ppt PFOA. (The EPA Health Advisory is 70 ppt for PFOS and PFOA combined).
- Five homes tested had levels below the EPA Health Advisories (between 3-24 ppt for PFOS and PFOA combined). PFAS were not detected at the other six homes tested.
- Sugarloaf is coordinating with Boulder County and CDPHE to determine where additional sampling is needed to determine risk. This assessment is complex due to fractured bedrock in the area.
- Boulder County has funded sampling private wells to date but expects to request support from CDPHE and EPA for future testing due to the high costs per sample.
- Sugarloaf is holding a board meeting on Tuesday, June 19, that is open to the public. One of the firefighters will present what is known at this time on PFAS. Boulder County, CDPHE, and EPA will attend to help answer any questions that the board or members of the public have about these contaminants.
- Contact: Sarah Bahrman, 312-6243

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Wetland Program Development Grant (WPDG) Proposals Received

Key Message: Region 8 received 20 eligible proposals that will be considered for FY18/19 WPDG funding.

- The WPDG Request for Proposals closed on June 1, 2018.
- The total amount requested is $4.3M, and Region 8 is expected to have $2.6M total to award in FY18/FY19.
- The next steps are individual reviews and then panel reviews, if necessary. The panel will prepare final ranked recommendations for OWP ARA approval.
- Region 8 expects to award 5-15 grants between $25K and $250K each by September 30, 2018.
- Contact: Cynthia Gonzales, 312-6569

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