Message

From: Manheimer, Jenna [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5A94674EFCD24005AC6B10D9747AB9EE-MANHEIMER, JENNIFER]
Sent: 9/27/2019 8:03:02 PM
To: Baron, Adam [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=563ef058707d4930868c6cf1e0828a43-Baron, Adam]; Duvil, Ricardi [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7b07dbc66afd4b20a424696e8e0debf7-Duvil, Rica]
CC: Martinson, Mathew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=07993c0bb86d42e4806a6eae5184a611-Martinson,]
Subject: RE: Notes from the weekly SDWA Orders compliance check-in with Warm Springs

Thanks for sharing, Adam and sounds like they are making some progress Ex. 6 Personal Privacy (PP)

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Ex. 6 Personal Privacy (PP) Though I'd rather Warm Springs get a couple of M&R violations if it means they will start tackling the crucial operational challenges.

How did briefing the TC go? You can tell me in person…

Thank you,
Jenna

From: Baron, Adam <Baron.Adam@epa.gov>
Sent: Friday, September 27, 2019 10:54 AM
To: Manheimer, Jenna <Manheimer.Jennifer@epa.gov>; Duvil, Ricardi <duvil.ricardi@epa.gov>
Cc: Martinson, Mathew <martinson.mathew@epa.gov>
Subject: FW: Notes from the weekly SDWA Orders compliance check-in with Warm Springs

Ex. 6 Personal Privacy (PP) mentioned in these notes from last week. I can include you all on these weekly updates if you would like.

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From: Baron, Adam
Sent: Friday, September 20, 2019 9:18 AM
To: 'Travis Wells' <travis.wells@wstribes.org>; 'Chico Holliday' <chico.holliday@wstribes.org>; 'Alyssa Macy'

<alyssa.macy@wstribes.org>
Cc: Thurmon, Clarke <Thurmon.Clarke@epa.gov>; Contreras, Peter <Contreras.Peter@epa.gov>; 'Ellen H. Grover' <ehg@karnopp.com>; Wilson, Wenona <Wilson.Wenona@epa.gov>; Bill Dunbar (dunbar.bill@epa.gov) <dunbar.bill@epa.gov>
Subject: Notes from the weekly SDWA Orders compliance check-in with Warm Springs

All –

See below for summary of today's meeting notes w/ high level summary for those of you reading quickly.

Also below are the previous week's notes for reference (which was a couple weeks back to Baron travel).

Call Notes – September 18, 2019:

High level messages:

The lack of in place contracts will likely cause the Tribe to be out of compliance with major requirements of both the Emergency Order and Order on Consent including the 120 day engineering assessment and correction of remaining significant deficiencies due by Oct 1. Similar lack of contracting also means the Tribe has no specific schedule to finish phase two of the pressure relieve valve (PRV) installation project – four PRVs remain to be installed. Although the Tribe has grant money from federal partners, the Tribe lacks the capacity currently to enter into contracts to spend that money on projects including complying with both EPA Orders.

Baron is working with the Tribe to secure a letter asking for extensions of these key requirements under the Order before the Tribe is actually out of compliance with the Orders.

The next tribal funding summit is scheduled next Tuesday, September 24th, with several high-level officials from multiple state and federal agencies participating in person.

Baron will brief the Tribal Council on the following Wednesday, September 25th. Talking points will include outcomes from the funding summit and discussion of the current lack of contracting causing the Tribe to likely miss requirements under the Order.

Detailed Call Notes – September 18, 2019:

1. Distribution system

- Status of emergency distribution system repairs and project for restoring service - contracts not completed for phase II, parts were just ordered. 3 or 4 weeks before the works is actually done. Contracts approved yesterday. PDG just completed order for parts. BIA money still waiting for contract management from PDG, waiting for 160K. Until that is in place, HUD/ BIA money still sitting there. Unknown on project timeline. Going through the process on asking for extensions to grants.
    - Did have a conversation about projects getting done with Alyssa, but no info on request for extension. Travis went to Michelle Stacona directly. Underscored the need for a letter requesting extension. Travis feels like he won't have dates/ timelines until he talks to PDG when they are under contract.
    - 120 assessment not going to get done either because not under contract.

- Any updates on monitoring/ sampling – IHSs, Ladd to come out October 2nd to verify new RTCR sites, also doing planning for leak detection system in distribution system. IHSs has money set aside for this project - vendor Century West.
- Any updates on alt. water provisions – Alyssa submitted final emergency plan and waiting for review/ signature from Baron.
- Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1 - See above

2. Plant operations - after actions taken by adding a SOP for inhouse turbidity event. Also SOP for chlorination system - how to trouble shoot and contract for annual maintenance and extra parts. SOP on how to shut down and start up plant. SOP on how to grab data off of turbidimeters - CMS etc.
    1. Steve Ex. 6 Personal Privacy (PP) Ronnie to take lead, adding another utility distribution to cover until Steve's replacement is on line. Part of reason for new SOPs. Does not have operator 1 yet. Ex. 6 Personal Privacy (PP)
3.
    - Evidence of sedimentation tank cleaned - done
    - Shift log conversation and getting coagulation SOP in place - done.
    - Training operators on event response requirements in emergency order - done
    - Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1 – see above
4. Other
    - Briefing on 25th wasn't on Travis's calendar yet. Now added. Looking at options to meet with Travis/ Chico/ Operators after briefing. No new equipment to look at – perhaps review SOPs.

Call Notes – August 21, 2019:

High level messages:

After finishing 4 of the 5 planned pressure relief valves (PRVs) installation, the Tribe submitted on August 7th distribution monitoring data showing negative for e.Coli and at least baseline residual chlorine levels. EPA concurred with the Tribe's recommendation to lift the boil water notice and the tribe did so that same day. The 5th PRV is awaiting a specialized piece of piping that will need to be custom cut. Once received, the Tribe plans to issue another boil water notice in about a month while the system is depressurized to install that last valve along with two others. The Tribe is no longer providing alternative water. Warm Springs will be using HUD grants to recoup their costs for this work.

On 8/13/19 Baron traveled to Warm Springs for a monthly update to brief the Warm Spring Tribal Council on the Tribe's drinking water issues including current compliance status under both the SDWA Emergency Order and Compliance Order. Baron advised the Council that their staff had now started implementing the coagulation SOP and recently submitted the alternative water plan to EPA for review as required under the Emergency Order. Alyssa Macy also provided a funding matrix to explain how the different sources of funding were being utilized, which Travis walked the Council through piece by piece. Alyssa also noted she's going to use some discretionary funding to contract PDG to help scope and enter contracts to spend down grant money already received in a more expedited manner.

The next key requirement of the Emergency Order is the 120-day engineering assessment. The Tribe has secured independent funding for the assessment and begun the scoping of that contract in dialogue with both EPA and the contractor. 30 days after the assessment is finished, the Emergency Order requires the Tribe to provide EPA a plan on how it will meet the assessment's recommendations. Warm Springs has funding for this assessment, and it will be performed by PDG, same firm that did the distribution system stabilization work. PDG and EPA have had some initial scoping conversations on this assessment.

EPA (Baron) is tentatively scheduled to go down again on September 23rd for the next monthly update.

Next funders meeting not yet scheduled.

Detailed Call Notes – August 21, 2019:

2. Distribution system
- Status of emergency distribution system repairs and project for restoring service - a lot of folks have a mistrust of the water. About the time people get used to it, then WS will be under another BWN for next PRV fix. Still looking for PDG to order custom T joint - 14 inch to 12 with 4 inch valve. George street, southeast, and Kah-ne-Ta. All about day long installs. Some taste/ odor complaints due to algae spikes typical of summer, trying to work on with activated carbon to reduce. Alt. water shut down last Thursday. Pressure readings - maintaining in some areas, filling up reservoirs. But loads of people watering their yards, use up. Meters required on since '95. WS have the authority to charge by volume but never done in the past. Will need to address in the future - fee structure. Fee structure as part of budget conversations. Travis will pitch at least charging flat fee for water, sewer, or garbage to Tribal Council. Also helps eligibility for RSF loans. Still looking for PDG to order custom T joint - 14 inch to 12 with 4 inch valve. George street, southeast, and kenata. All about day long installs.
- Any updates on monitoring/ sampling – WS needs to contact Ladd at IHSs to ensure new sampling point they've added for RTCR sampling is appropriate – old one unserviceable due to house fire. Noted some low levels of chlorine residual on 3 samples sites. Seemed likely due to sampling error. Travis will go over sampling protocol with his folks.
- Any updates on alt. water provisions – Adam needs to get back to Alyssa with comment.
- Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1 - no funding. Asked for EPA help. Adam will contact Alyssa about funding. BIA or HUD money doesn't seem to fit here. Fabricator on contract though for access ladders.

5. Plant operations
   - Evidence of sedimentation tank cleaned - done
   - Shift log conversation and getting coagulation SOP in place - jar testing improving, making process tweaks based on findings.
   - Training operators on event response requirements in emergency order - done
   - Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1 – see above
6. Other
   - Possible next trip for Baron down on 23rd.

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From: Baron, Adam
Sent: Wednesday, August 21, 2019 5:46 PM
To: 'Travis Wells' <travis.wells@wstribes.org>; 'Chico Holliday' <chico.holliday@wstribes.org>; 'Alyssa Macy' <alyssa.macy@wstribes.org>
Cc: Thurmon, Clarke <Thurmon.Clarke@epa.gov>; Contreras, Peter <Contreras.Peter@epa.gov>; 'Ellen H. Grover' <ehg@karnopp.com>; Wilson, Wenona <Wilson.Wenona@epa.gov>; Bill Dunbar (dunbar.bill@epa.gov) <dunbar.bill@epa.gov>
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1. Plant operations

- Evidence of sedimentation tank cleaned - done
- Shift log conversation and getting coagulation SOP in place - jar testing improving, making process tweaks based on findings.

- Training operators on event response requirements in emergency order - done
- Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1 – see above

2. Other
   - Possible next trip for Baron down on 23rd.

Detailed Call Notes – August 7, 2019:

1. Distribution system

- Status of emergency distribution system repairs and project for restoring service
  - Of the 5, 2 are replaced for vault service Industrial complex (Monday), and Catholic church vault to serving agency area (Tuesday), now working on George street vault, then tomorrow repair vaults for Greely heights and West Hills. Greely and West Hills already Clay-type valves - just need to be rebuilt. So 5 of the 7 in by end of the week. George street vaults is the main issue - line was bigger - 12'" line, thought was 10". A 12″ to 10" reducer with a 4″ bypass needs to be requisitioned, hopefully on site tomorrow, but may be a custom piece that needs to be cut. Also ran in to class 300 flange - different bolt pattern from 150 flange. Reduction in size shouldn't reduce flow because already reduced to 8" inch in side vault.
- Any updates on monitoring/ sampling - intent was to start sampling Monday for first round of Bacti, second round on Wednesday. But might be delayed. **EPA confirms that all is needed are two rounds of sampling showing non-detect on Bacti and at least .2 residual chlorine from the following bact monitoring locations: WS-04, WS-07, WS-10, WS-13, WS-14, WS-16, WS-19, WS-22, WS-25, WS-28, WS-30, WS-32, WS-35. See WQMP for location ID.**
- Any updates on alt. water provisions - still open and serving water
- Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1 - talked to Ladd about over structure on top of tank – Ladd said he was okay, but Adam will verify in writing. Adam requested some sort of drawing from Travis that EPA could review – Travis will send. No update for IHSs on scope of work with Derrick. Need to get bids out in order to use USDA dollars. Contractor officer Tribal employment rights office to negotiate contract. This is all screen repair and water reroute, HVAC, pump replacement. Have plans from IHSs but not yet scope of work to put out bids for contracts. EPA will review status when on site next week. Travis sent email with plan from Derick at IHSs for background.

2. Plant operations

- Evidence of sedimentation tank cleaned - done
- Shift log conversation and getting coagulation SOP in place – SOP not being implemented. Baron relayed conversation with Steve Courtney on Monday, where Steve wouldn't do it without on-site training. Baron said they are required to start and EPA will trouble shoot with them if they get stuck. Chico noted they are certified operators and should know how to do it. Need to have evidence that they are doing it by briefing on Monday. Must be accountable for their workload. **Otherwise, Baron will report out that they are in violation with the requirement of the 1431 Order.**
- Training operators on event response requirements in emergency order - done

- Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1 - see above.

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From: Baron, Adam
Sent: Wednesday, August 07, 2019 3:23 PM
To: Travis Wells <travis.wells@wstribes.org>; Chico Holliday <chico.holliday@wstribes.org>; Alyssa Macy <alyssa.macy@wstribes.org>
Cc: Thurmon, Clarke <Thurmon.Clarke@epa.gov>; Contreras, Peter <Contreras.Peter@epa.gov>; Ellen H. Grover <ehg@karnopp.com>; Wilson, Wenona <Wilson.Wenona@epa.gov>; Mark MacIntyre (Macintyre.Mark@epa.gov) <Macintyre.Mark@epa.gov>
Subject: RE: Notes from today's weekly SDWA Orders compliance check-in with Warm Springs

All –

See below for summary of today's meeting notes w/ high level summary for those of you reading quickly.

Also below are last week's notes for reference.

Call Notes – August 7, 2019:

High level messages:

Distribution system construction is underway, with 2 of the 7 pressure relief valves (PRVs) already in place. Original plan was to have all the main 5 PRVs/ vaults done by end of this week, which is still possible, but a parts issue may cause repair to run into next week. Once work is finished, pipes can be re-pressurized, flushed, tested, and brought back into service with boil water notice lifted depending on test results. This could happen as early as next Wednesday. Alterative water station and boil water notice will remain in place until then. Warm Springs will be using HUD grants to recoup their costs for this work.

Warm Springs utilities have been appropriately focused on distribution system stabilization. Accordingly, they have fallen behind on the following 1431/ 1414 Orders' requirements: 1) Alt. water/ Emergency plan updated with new SOPs and clearer alt water provisions, 2) Coagulation SOP implementation, and 3) contracting process to ensure significant deficiencies are addressed by October 1, 2019. Warm Springs have taken steps

towards advancing this work, but increasingly likely they will be out of compliance with some requirements of the Orders.

Soon after system stabilization, Warm Springs needs to move to focusing on the 120-day engineering assessment. Warm Springs has funding for this assessment, and it will be performed by PDG, same firm that did the distribution system stabilization work. PDG and EPA have had some initial scoping conversations on this assessment.

EPA (Baron) will be on-site again for monthly briefing of Tribal Council on August 12. At that point, EPA will also do a walk through to see status of distribution system work and review progress under the orders generally.

Next funders meeting has been postponed.

Detailed Call Notes – August 7, 2019:

1. Distribution system

- Status of emergency distribution system repairs and project for restoring service
  - Of the 5, 2 are replaced for vault service Industrial complex (Monday), and Catholic church vault to serving agency area (Tuesday), now working on George street vault, then tomorrow repair vaults for Greely heights and West Hills. Greely and West Hills already Clay-type valves - just need to be rebuilt. So 5 of the 7 in by end of the week. George street vaults is the main issue - line was bigger - 12'" line, thought was 10". A 12" to 10" reducer with a 4" bypass needs to be requisitioned, hopefully on site tomorrow, but may be a custom piece that needs to be cut. Also ran in to class 300 flange - different bolt pattern from 150 flange. Reduction in size shouldn't reduce flow because already reduced to 8" inch in side vault.
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- Any updates on alt. water provisions - still open and serving water
- Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1 - talked to Ladd about over structure on top of tank – Ladd said he was okay, but Adam will verify in writing. Adam requested some sort of drawing from Travis that EPA could review – Travis will send. No update for IHSs on scope of work with Derrick. Need to get bids out in order to use USDA dollars. Contractor officer Tribal employment rights office to negotiate contract. This is all screen repair and water reroute, HVAC, pump replacement. Have plans from IHSs but not yet scope of work to put out bids for contracts. EPA will review status when on site next week. Travis sent email with plan from Derick at IHSs for background.

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- Training operators on event response requirements in emergency order - done
- Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1 - see above.

Call Notes – July 31, 2019:

High level messages:

Distribution system construction to be completed by contractors in early August, conformational sampling into EPA mid-August and potentially boil water notice can be lifted by mid to late August. Alt water and boil water notice will remain in place until then. Warm Springs will be using HUD grants to recoup their costs for this work.

Warm Springs utilities have been appropriately focused on distribution system stabilization. Accordingly, they have fallen behind on the following 1431/ 1414 requirements: 1) Alt. water/ Emergency plan updated with new SOPs and clearer alt water provisions, 2) Coagulation SOP implementation, and 3) contracting process to ensure significant deficiencies are addressed by October 1, 2019. Warm Springs have taken steps towards advancing this work, and we'll continue to run it to ground.

Soon after system stabilization, Warm Springs needs to move to focusing on the 120-day engineering assessment. Warm Springs has funding for this assessment, and it will be performed by PDG, same firm that did the distribution system stabilization work.

EPA (Baron) will be on site again for monthly briefing of Tribal Council on August 12. At that point, EPA will also do a walk through to see status of distribution system work and review progress under the orders generally.

Next funders meeting will be on August 6.

Call Notes – July 31, 2019:

1. Distribution system
    - Status of emergency distribution system repairs and project for restoring service -
    - Checo/ staff focusing on insolating valve vaults before PRV install, tough because no records of lines installed/ removed/ replaced. So chasing down, 5 or 6 valves to isolate one vault. If they can't isolate at valve, will have to shut whole sections off so people won't have water. Gelco should have parts now and beginning assembly. Delivery to vaults end of this week/ beginning of

next. Construction still to start August 5th. Notice will go to fire department so they know which buildings won't have water. Sampling to EPA week of Aug 12th, if good BWN can be lifted.

2. Any updates on monitoring/ sampling –
   - probably sampling week of Aug 12th
3. Any updates on alt. water provisions - still open and being used. Emergency Plan updated and submitted?
   - Not yet done. Alyssa had pen and ink version. Alt water still open with showers, even though people can boil. 2K a week for shower facilities.
4. Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1
   - Chico met with fabricator last Friday. Looking at prefab ladders first, but may have to be custom. Glass line tanks, could break with the welding, cause contamination. Might have to drain tanks after. Also looking at over frame concept for hatches. Maybe over frame bolted to hinges as workaround the rust issues. Detail drawn up to EPA before they move forward. Also lots going on waste water side contracting, getting bids in for septic tank replacement. IHSs putting together a scope of work for intake screen. HVAC moving forward with McDonald Miller as contractor. Looking to electrical and SCADA.
   - USDA on site yesterday afternoon, with Oregon Assoc. Water Utility looking at plant - may have more funds, trying to help
5. Plant operations
   - Evidence of sedimentation tank cleaned - done
   - Shift log conversation and getting coagulation SOP in place – Did not start his week Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) Will talk to him tomorrow. One operator still needs his cert. OIAW might be providing some training for operators on SOP?
   - Training operators on event response requirements in emergency order - done
   - Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1- see above.
6. Other
   - Adequate staffing exercise - determination was no cuts possible in DW, Waste water department. Actually suggested adding Water/ Waste water director with 5 distribution/ collection operators, one lead plant operator with 3 operators under lead, plus some level of meter reading. 14 total staff with waste water/ dw combined as opposed to 8 current. Looking at ways to offset these costs and then present to council.
   - EPA site visit on 12 - block of after 1 to 3:30, pre meeting on 8th.
   - RCAC still on will do distribution system training for operators on residuals, water age, and calculations involved – scheduled for Aug 13 to Aug 15
   - Training by PDG moving forward this week with scope of work. First training will be delivered in late nov to update SOPs at current condition of plant, and second set after engineering assessment recommendation are implemented by tribe – new equipment and SOPs, etc.
   - Reseeding on wastewater plant as well this week.

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From: Baron, Adam
Sent: Wednesday, July 31, 2019 10:50 AM
To: 'Travis Wells' <travis.wells@wstribes.org>; 'Chico Holliday' <chico.holliday@wstribes.org>; 'Alyssa Macy' <alyssa.macy@wstribes.org>
Cc: Thurmon, Clarke <Thurmon.Clarke@epa.gov>; Contreras, Peter <Contreras.Peter@epa.gov>; 'Ellen H. Grover' <ehg@karnopp.com>; Wilson, Wenona <Wilson.Wenona@epa.gov>; Mark MacIntyre (Macintyre.Mark@epa.gov) <Macintyre.Mark@epa.gov>
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All –

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   - Not yet done. Alyssa had pen and ink version. Alt water still open with showers, even though people can boil. 2K a week for shower facilities.
4. Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1
   - Chico met with fabricator last Friday. Looking at prefab ladders first, but may have to be custom. Glass line tanks, could break with the welding, cause contamination. Might have to drain tanks after. Also looking at over frame concept for hatches. Maybe over frame bolted to hinges as workaround the rust issues. Detail drawn up to EPA before they move forward. Also lots going on waste water side contracting, getting bids in for septic tank replacement. IHSs putting together a scope of work for intake screen. HVAC moving forward with McDonald Miller as contractor. Looking to electrical and SCADA.
   - USDA on site yesterday afternoon, with Oregon Assoc. Water Utility looking at plant - may have more funds, trying to help
5. Plant operations
   - Evidence of sedimentation tank cleaned - done
   - Shift log conversation and getting coagulation SOP in place – Did not start his week Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) Will talk to him tomorrow. One operator still needs his cert. OIAW might be providing some training for operators on SOP?
   - Training operators on event response requirements in emergency order - done
   - Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1- see above.
6. Other
   - Adequate staffing exercise - determination was no cuts possible in DW, Waste water department. Actually suggested adding Water/ Waste water director with 5 distribution/ collection operators, one lead plant operator with 3 operators under lead, plus some level of meter reading. 14 total staff with waste water/ dw combined as opposed to 8 current. Looking at ways to offset these costs and then present to council.
   - EPA site visit on 12 - block of after 1 to 3:30, pre meeting on 8th.
   - RCAC still on will do distribution system training for operators on residuals, water age, and calculations involved – scheduled for Aug 13 to Aug 15
   - Training by PDG moving forward this week with scope of work. First training will be delivered in late nov to update SOPs at current condition of plant, and second set after engineering assessment recommendation are implemented by tribe – new equipment and SOPs, etc.
   - Reseeding on wastewater plant as well this week.

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From: Baron, Adam
Sent: Wednesday, July 24, 2019 3:19 PM
To: Travis Wells <travis.wells@wstribes.org>; 'Chico Holliday' <chico.holliday@wstribes.org>; Alyssa Macy <alyssa.macy@wstribes.org>
Cc: Thurmon, Clarke <Thurmon.Clarke@epa.gov>; Contreras, Peter <Contreras.Peter@epa.gov>; Ellen H. Grover <ehg@karnopp.com>; Wilson, Wenona <Wilson.Wenona@epa.gov>
Subject: Notes from today's weekly SDWA Orders compliance check-in with Warm Springs

All –

See below for summary of today's meeting notes w/ high level summary for those of you reading quickly.

Also below are last week's notes for reference. I was just sending these to Travis, but I'll expand to this audience as requested.

High level messages:

Distribution system construction to be completed by contractors in early August, conformational sampling into EPA mid-August and potentially boil water notice can be lifted by mid to late August. Alt water and boil water notice will remain in place until then. Warm Springs will be using HUD grants to recoup their costs for this work.

Warm Springs utilities have been appropriately focused on distribution system stabilization. Accordingly, they have fallen behind on the following 1431/ 1414 requirements: 1) Alt. water/ Emergency plan updated with new SOPs and clearer alt water provisions, 2) Coagulation SOP implementation, and 3) contracting process to ensure significant deficiencies are addressed by October 1, 2019. Warm Springs have taken steps towards advancing this work, and we'll continue to run it to ground.

Soon after system stabilization, Warm Springs needs to move to focusing on the 120-day engineering assessment. Warm Springs has funding for this assessment, and it will be performed by PDG, same firm that did the distribution system stabilization work.

EPA (Baron) will be on site again for monthly briefing of Tribal Council on August 12. At that point, EPA will also do a walk through to see status of distribution system work and review progress under the orders generally.

Next funders meeting will be on August 6.

Call Notes – July 24, 2019:

1. Distribution system
   - Status of emergency distribution system repairs and project for restoring service - All contractors have POs in place, materials can be ordered and delivered. July 29th for Gelco assembly in their yard - following week for five valves installed, industrial complex valve, west hills. Aug 5th start and then Aug 9th done, then electrical upgrades in vaults. Sampling to EPA week of Aug 12th, if good BWN can be lifted.
2. Any updates on monitoring/ sampling –
   - probably sampling week of Aug 12th
3. Any updates on alt. water provisions - still open and being used. Emergency Plan updated and submitted?
   - Not yet done. Travis talked to Alyssa, it's on her stack to work with Dan but is pushed back by other priorities.
4. Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1
   - Chico met with contractor today and went through CAP page by page. Contractor will start ordering parts by Aug 1st deadline. Contractor will provide weekly progress reports based on CAP numbering, which Chico can then share with EPA.
5. Plant operations
   - Evidence of sedimentation tank cleaned - done
   - Shift log conversation and getting coagulation SOP in place – Chico was waiting back for Baron to contact Lad at IHSs. Lad emails came back that he can't get there until mid-September for Jar Testing training. Chico thinks operators have what they to start, so Chico will require to start each operator to start testing every 12 hr shift beginning July 29th.
   - Training operators on event response requirements in emergency order - done
   - Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1- see above.
6. Other
   - Tribal council requested budget exercise of cutting managers, would be Travis for utilities
   - Alyssa requested exercise of giving council numbers on adequate staffing for DW and Waste water side. Will be provided to Tribal Council.
   - Baron to brief Tribal Council again on Aug 12th – will only be me since things are generally tracking well
   - Funders second meeting on Aug 6th – Baron won't be there
   - RCAC will do distribution system training for operators on residuals, water age, and calculations involved – scheduled for Aug 13 to Aug 15
   - Baron laid out idea of EPA funded training done by PDG after engineering assessment recommendation are implemented by tribe – new equipment and SOPs, etc. Asked if they saw any flaws. Said it would be welcome, it would just be about timing up with new equipment install.
   - Baron will be doing a compliance inspection along with October monthly briefing to verify compliance with 1414, includes taking pictures of all fixes as evidence of compliance with order.

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From: Baron, Adam
Sent: Wednesday, July 17, 2019 10:44 AM
To: Travis Wells <travis.wells@wstribes.org>
Cc: Thurmon, Clarke <Thurmon.Clarke@epa.gov>; Ellen H. Grover <ehg@karnopp.com>
Subject: Notes from today's weekly SDWA Orders compliance check-in with Warm Springs

1. Distribution system

- Status of emergency distribution system repairs and project for restoring service.
  - Priority vault set, George street and Catholic street first, then Greely and West Hills(?). PGE price is in and within budget established of 450 K. Plan is to remove golden anderson valves and go to clayton. Gelco will install. PGE purchasing components. Class of flange change for higher PSI rating – inside vault for exit/ entry, connect to spools that then connect to clay valves. Availability of parts moves start date to July 29, planned for 3 days work. Gelco will pre assemble components off site, then deliver to site, gut vaults down to entry and exit lines, then drop in all components. Vaults will still have high flow and low flow lines, low flows as by pass. Gelco has crew of 6, 2 person each vault with one crew focused on removing lid/ prep, then another removing components, then another install. SE and Kah-Ne-Ta vault still left, will cost about 250 K. Still considering how to bring on line as quickly as possible - shock chlorine of lines after install? Maybe can be done before hand to reduce time, maybe just flushing to bacti testing. Bacti results would start coming back in first week of August. Anything else required before BWN? EPA to make clear what data is needed beforehand by check in call on 31st.
- Any updates on monitoring/ sampling
  - see above
- Any updates on alt. water provisions – emergency POCs updated?
  - Tribe has not submitted anything to EPA yet. Dan Martinez – Alyssa – Travis will ask for status.
- Status of contracts to meet repairs required to storage tanks in compliance order, due Oct 1.
  - No updates right now b/c Chico focused on valve replacement. Need to start process quickly after water is on or risk missing deadline.

2. Plant operations

- Shift log conversation and getting coagulation SOP in place
  - EPA trying to set up training, probably to come from IHS.
- Training operators on event response requirements in emergency order
  - reviewed with them on-site last week and operators showed evidence that they were keeping up with data requirements.
- Status of SOP changes/ contracts to meet repairs required at water plant in compliance order, due Oct 1
  - TBD – see above

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