From:	Baron, Adam
To:	Joe Bob; OShea, Michael (IHS/POR)
Cc:	Rickie W. Armstrong; Hartman, Bob
Subject:	Follow up action items from 4/17 call with Joe Bob from Nooksack and 4/19 call with MIke O"Shea of IHS
Date:	Wednesday, April 19, 2017 4:07:27 PM

All –

These are my notes on action steps required by the Admin Orders based on our calls this week. These notes are presented in EPA's continued role of offering compliance assistance to the Nooksack Indian Tribe. Please note, the Orders are in full effect and controlling and if my notes differ in any way from the requirements of the Orders, be aware it's the Orders that control.

See list below. Follow up steps for O'Shea are in red, for Joe Bob in blue, and for Baron in green. Let me know if you have any questions or if you had a different understanding from what I wrote up here.

Thanks all.

RTCR violations – Baron verified status in hard files, Joe said they were currently collecting early in the month and sending to Avocet lab. Hard file showed that to be the case. But according to EPA database and most recent WQMP, 2 samples are required to be collected, but PWS only collecting one. Due to Casino closing and population change, maybe 1 is all that is now required. Mike O'Shea will be on site to verify on April 25th and update WQMP which will then be updated in EPA database with number of samples required and sample sites. Important to get this right because RTCR monitoring is first requirements due in the Orders.

CCR and PN violations – Joe thought he could have those done at least in draft by May 3rd.

Sig Deficiencies/ Revised CAPs –

All systems are required to have a written SOP, Emergency Response Plan, and Cross Connection Plan. These should be accomplished by May 3rd. O'Shea will confirm Joe has most current template.

Kevin Roberts is operator and has Water operator 1 cert. Does Joe need water manager level 3 cert? O'Shea will provide worksheet used by NAWMA to verify what level is required for Kevin and Joe. Then we'll confirm when the next training is offered.

5 Cedars:

Vent cap will be installed by May 3rd

rd

Raw sample tab will be installed by May 3

GWUDI – within 500 ft of surface water is standard in EPA QAPP. Doesn't appear to be the case. Need to verify lat lon. Baron will walkthrough on May 3rd and if nothing, confirm this sig def is resolved.

Inactive well closure – need to find requirements. Capping and removing associated piping. Joe said housing maintenance would be able to do that, but would take some time. O'Shea will provide document verifying well closure requirements in WA and apply here so Joe can use to play contract.

Clear well issues, access, overflow, ventilation on booster pump – all were under IHSs contract to be remedies but now stalled. How to address? Still open issue, Baron will evaluate when on site on May 3rd.

Nooksack River Casino:

General issues that apply to all, can be remedied by May 3rd.

Northwood Casino:

General issues that apply to all, can be remedied by May 3rd.

Rutsatz Road:

Well within 100 feet of sewer line and septic tank. Tribe likely to want to construct a barrier, this will need to be contracted out. O'Shea may be able to help with analysis of if intrusion is likely.
GWDUI on well 1 and 2 - within 500 ft of surface water is standard in EPA QAPP. Doesn't appear to be the case. Need to verify lat lon. Baron will walkthrough on May 3rd and if nothing, confirm this sig def is resolved.

Casing not 18 inches above grade – can be remedied by May 3rd.

Improper instrumentation or process controls – flow switch on chlorination unit not attached, needs redundancy. O'Shea to verify this is the issue and follow up when on site on April 25th.

Op training – this system adds soda ash to control pH and op doesn't have that cert. Need to confirm next training opportunity. See above, O'Shea to provide worksheet

No blow offs – will need to contract out. O'Shea provided hydrant map for site. To verify with plumbing codes spacing requirements and then physical walk site to ensure present as listed on map.

Pump house ventilation – housing maintenance can do, but will need time.

Sulwhanon:

Casing not 18 inches above grade – can be remedied by May 3rd.

Well within 100 feet of sewer line and septic tank. Tribe likely to want to construct a barrier, this will need to be contracted out. But if different well to be used from Genesis, then may resolve issue. O'Shea to review options while on site.

No raw sample tap – Joe thought there was one, but either way can be remedied by May 3rd

Missing well vent – can be remedied by May 3rd

Pump house ventilation – housing maintenance can do, but will need time.

Whispering Cedars:

Missing well vent – can be remedied by May 3rd

Casing not 18 inches above grade – can be remedied by May 3rd.

Pump house ventilation – housing maintenance can do, but will need time.

Adam Baron
Drinking Water Compliance Officer
U.S. EPA, Region 10 (OCE-101)
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
(206) 553-6361
baron.adam@epa.gov