From:	Baron, Adam
To:	Rickie W. Armstrong; Joe Bob
Cc:	Hartman, Bob; Contreras, Peter; OShea, Michael (IHS/POR); Haith, Matt (IHS/DES); Jennings, Marie
Subject:	Follow up on today"s call on Nooksack Drinking Water Orders
Date:	Wednesday, April 12, 2017 4:15:00 PM

All –

Thanks for the call today, I hope we can work effectively together to keep the Nooksack Indian Tribe on task to comply with the Orders and SDWA generally.

Specifically, today we talked about a few major compliance requirements within the Orders:

1) First milestone to meet is total coliform sampling with chlorine residuals for both Sulwhanon and Nooksack River Casino, due by May 10th. We confirmed that access is no longer a barrier to getting to those sampling point in the written total coliform sampling plan at the River Casino. We also stressed the importance of making sure the lab includes the chlorine residual level when the total coliform monitoring report is submitted to EPA.
2) We talked about changes to the UAOs from what we agreed to back in November, namely that the Orders included the option to submit new CAPs if sig.def. can't be fully remedied within the Order's timelines. Physical remedy of each sig.def. is best, but where more time is needed, the tribe can submit new CAPs that define how the tribe will remedy those sig.def. and by when. These new CAPs are subject to EPA approval and can be amended without amending the entirety of the Order.
3) Several requirements will be due on June 9, 2017, which is 60 days from the effective date of the Orders. EPA will provide specific compliance assistance including an on-site visit to help ensure the tribe's planned response meets the terms of the Orders.
4) There are other SDWA compliance issues outside of the Orders, specifically lead ALEs at Sulwhanon. We talked through planned source water changes and water chemistry and recent testing showing the system will likely be able to comply with the Lead and Copper Rule.
5) Due to the nature of lead and copper sampling, some of these Orders will remain open until at least October of 2017, even while other requirements are due and may be already returned to compliance.

Next steps:

April 17, 2017, Adam will call Joe at 360 389 1597 on Monday at 1 to talk through each sig.def. and tribe's plans to remedy and in what probable timeframe.

May 3, 2017, Adam will physically visit the systems to review the documents the tribe plans to submit to EPA to comply with the Orders, and do a walkthrough of the systems to talk through sig.def. at each. Adam offered to do an intro conference with tribal leadership if they wish. Rickie said he would confirm with his management. IHS representatives will be invited as well.

May 10th, 2017, first compliance date for two of the Orders as discussed above.

Thanks again and let me know if you have any questions or edits.

Adam Baron

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