From:	Baron, Adam
To:	Joe Bob; Rickie W. Armstrong; reedwards@nooksack-nsn.gov
Cc:	Hartman, Bob; OShea, Michael (IHS/POR); Haith, Matt (IHS/DES)
Subject:	Drinking Water Compliance Assistance Visit to the Nooksack Indian Tribe regarding PWSs under EPA Admin Orders
Date:	Tuesday, May 09, 2017 5:21:25 PM

Joe/ All –

We had a successful site visit last Wednesday. I've summarized all the requirements for the Nooksack under Orders below. The ones in red are due June 9th. The ones in green are already resolved. The ones in blue, I've agreed to do some more research on along with IHSs and advise you accordingly. Note that any violations of the Orders could result in substantial fines against the Nooksack Indian Tribe, so make sure to make this a priority.

Thanks for your continued commitment to safe drinking water. Contact me if you have any questions.

Note that I realized I have a conflict on May 25th, and reschedule to June 1st for out next check in. All reference below to May 25th and accordingly now June 1st.

Thanks.

By system, here are the outstanding requirement under the order with notes on how they were resolved or how Joe indicated they would be resolved in the future. The effective date of all the Orders was 4/10/17.

5 Cedars

CCR due within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Revised CAP within 180 days of the Effective Date of Order (10/7/17): Joe discussed how each of the significant deficiencies would be addressed. Details on each significant deficiency below.

- Improper well vent: Will have installed by contractor. Contractor bid package ready by May 25th.
- No raw water tap: Housing maintenance can install. Will task them with work assignment and verify status by May 25th.
- GWUDI assessment needed: Confirmed while on site that specific factors requiring assessment are not present. No GWUDI assessment required. Significant deficiency addressed.
- Abandoned well needs to be closed: Will have closed by contractor according to Washington plumbing code. Contractor bid package read by May 25th.
- Access to clear well: Confirmed access was adequate while on site. Significant deficiency addressed.

- Improper clear well overflow: Need to follow up with TUC on proper routing for overflow. Adam will facilitate.
- Improper booster pump ventilation on clear well: Need to follow up with TUC on proper ventilation required. Adam will facilitate.
- Operator Training Needed: TUC reviewed Joe's previous training much of which has expired. Basically if Joe can get current with CLEs and get these qualifications current again, he will have adequate training. Joe confirmed he has the budget to attend CLEs and will investigate when they will next be available.
- No written SOP: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Emergency Response Plan: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Cross Connection Control Program: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.

Tier 3 Public Notice with a copy and certification sent to EPA within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Rutsatz Road

Asbestos Sampling within 60 days of Effective Date of Order (6/9/17): Joe committed to sampling by May 25th.

CCR due within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Revised CAP within 180 days of the Effective Date of Order (10/7/17): Joe discussed how each of the significant deficiencies would be addressed. Details on each significant deficiency below.

- Well within 100 feet of septic tank/ sewer line: Well #2 will be closed and the system will only use well #1 which does not have this issue. Contractor bid package ready by May 25th.
- GWUDI assessment needed: Confirmed while on site that specific factors requiring assessment are not present. No GWUDI assessment required. Significant deficiency addressed.
- Wellhead less than 18 inches above grade: Well #2 will be closed and the system will only use well #1 which is currently only 7 inches above grade. Contractor bid package read by May 25th.
- Improper instrumentation: Confirmed on site that process controls working properly. TUC also verified when he was on site. No further action required. Significant deficiency addressed.
- Operator Training Needed: TUC reviewed Joe's previous training much of which has expired. Basically if Joe can get current with CLEs and get these qualifications current again, he will have adequate training. Joe confirmed he has the budget to attend CLEs and will investigate when they will next be available.
- Inadequate flushing in the distribution system: Based on observation by myself and TUC, hydrant distance from last connection is within 300 feet, which is an adequate

distance for blow off according to Washington state plumbing code. No further action required. Significant deficiency addressed.

- Improper pump house ventilation: Joe agreed to remove the plugs that had been installed to the ventilation and have housing maintenance install appropriate screens. Joe will task housing maintenance and provide update on May 25th.
- No written SOP: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Emergency Response Plan: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Cross Connection Control Program: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.

Tier 3 Public Notice with a copy and certification sent to EPA within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Whispering Cedars

Lead and Copper Sampling by September 30, 2017 and submitted to EPA no later than October 10, 2017: Joe committed to this monitoring.

CCR due within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Revised CAP within 60 days of the Effective Date of Order (6/9/17): Joe discussed how each of the significant deficiencies would be addressed. Details on each significant deficiency below.

- Improper well vent: Will have installed by contractor. Contractor bid package read by May 25th.
- Wellhead less than 18 inches above grade: Work already accomplished. Significant deficiency addressed.
- Improper pump house ventilation: Joe agreed to remove to have housing maintenance install appropriate ventilation and screens. Joe will task housing maintenance and provide update on May 25th.
- Operator Training Needed: TUC reviewed Joe's previous training much of which has expired. Basically if Joe can get current with CLEs and get these qualifications current again, he will have adequate training. Joe confirmed he has the budget to attend CLEs and will investigate when they will next be available.
- No written SOP: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Emergency Response Plan: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Cross Connection Control Program: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.

Tier 3 Public Notice with a copy and certification sent to EPA within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Sulwhanon

Radiological monitoring within 60 days of Effective Date of Order (6/9/17): Joe committed to this monitoring.

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CCR due within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Revised CAP within 180 days of the Effective Date of Order (10/7/17): Joe discussed how each of the significant deficiencies would be addressed. Details on each significant deficiency below.

- Wellhead less than 18 inches above grade: Switching to the Genesis well which is 19 inches above grade. Joe to provide a contractor bid package to close other well, ready by May 25th.
- Well within 100 feet of septic tank/ sewer line: Well #2 will be closed and the system will only use well #1 which does not have this issue. Contractor bid package ready by May 25th.
- No raw water tap: Housing maintenance can install at Genesis pump house. Joe will task them with work assignment and verify status by May 25th.
- Improper well vent: Will have installed by contractor. Contractor bid package ready by May 25th.
- Improper pump house ventilation: Joe agreed to remove to have housing maintenance install appropriate ventilation and screens at both Genesis and Sulwhanon pump houses. Joe will task housing maintenance and provide update on May 25th.
- Operator Training Needed: TUC reviewed Joe's previous training much of which has expired. Basically if Joe can get current with CLEs and get these qualifications current again, he will have adequate training. Joe confirmed he has the budget to attend CLEs and will investigate when they will next be available.
- No written SOP: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Emergency Response Plan: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Cross Connection Control Program: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.

Tier 3 Public Notice with a copy and certification sent to EPA within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Nooksack River Casino

RTCR and residual disinfectant monitoring for 3 consecutive months: Joe worked with the TUC to revise the RTCR sampling plan in early May, which changed both the number and location of the sampling site. We confirmed Joe had access. EPA has received these samples for May.

Lead and Copper Sampling by September 30, 2017 and submitted to EPA no later than October 10, 2017: Joe committed to this monitoring.

Revised CAP within 60 days of the Effective Date of Order (10/7/17): Joe discussed how each of

the significant deficiencies would be addressed. Details on each significant deficiency below.

- No raw water tap: Housing maintenance can install at pump house. Joe will task them with work assignment and verify status by May 25th.
- Operator Training Needed: TUC reviewed Joe's previous training much of which has expired. Basically if Joe can get current with CLEs and get these qualifications current again, he will have adequate training. Joe confirmed he has the budget to attend CLEs and will investigate when they will next be available.
- No written SOP: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Emergency Response Plan: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Cross Connection Control Program: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.

Tier 3 Public Notice with a copy and certification sent to EPA within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

Northwood River Casino

Lead and Copper Sampling by September 30, 2017 and submitted to EPA no later than October 10, 2017: Joe committed to this monitoring.

Revised CAP within 60 days of the Effective Date of Order (6/9/17): Joe discussed how each of the significant deficiencies would be addressed. Details on each significant deficiency below.

- Operator Training Needed: TUC reviewed Joe's previous training much of which has expired. Basically if Joe can get current with CLEs and get these qualifications current again, he will have adequate training. Joe confirmed he has the budget to attend CLEs and will investigate when they will next be available.
- No written SOP: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Emergency Response Plan: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.
- No written Cross Connection Control Program: Confirmed template had been provided to Joe by TUC. Joe will have draft by May 25th.

Tier 3 Public Notice with a copy and certification sent to EPA within 60 days of Effective Date of Order (6/9/17): Joe committed to having a draft ready for review by May 25th.

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