



**June 9, 2020**

### **Transient and Seasonal System Sector Deviations from Normal Protocols – COVID-19**

Montana has approximately 1,150 transient public water supplies such as restaurants, bars, and churches. Many of these have shut down completely due to the COVID-19 pandemic. All of these systems are required to sample for bacteria on a monthly or quarterly basis. Some systems may also be required to monitor and report monthly chlorine residual levels. Historically, if a system has been completely shut down and not serving or using their water for an entire month due to situations like fires or inaccessible mountain roads, DEQ has exercised discretion by not issuing violations to these systems for not collecting bacteria samples or reporting chlorine residual levels during the month(s) that they were shut down.

The Public Water Supply Bureau recommends that all systems continue to sample monthly if possible. However, DEQ intends to exercise discretion for systems that are completely shut down and not serving or using water due to COVID-19 and cannot sample or choose not to sample during the months that they are shut down.

Because there are a large number of these systems and because DEQ is exercising complete transparency about the discretion that we are allowing, systems must email DEQ with their closed status for the month (including the month of April). DEQ then may verify the system's status and if appropriate, respond that the system will not be required to collect bacteria samples or collect and report chlorine residuals from the distribution system for that month and that the information will be made publicly available. The names and Public Water System ID numbers will be made available to the public in a spreadsheet shared on DEQ's Updates website: <https://deq.mt.gov/updates>.

Some schools will also fit into the discretionary category described above. This will only apply to schools that are closed, not serving lunches, and not allowing staff entry. All other schools will be required to continue to sample and report as required if they are open to staff and/or making bag lunches.

The final category of public water systems for which DEQ will allow COVID-19 discretion is seasonal transient systems such as campgrounds that will be opening late. They will follow the same process outlined above.

Copies of system requests and approvals will be maintained and will be made available to the public if requested.

If systems forget to report that they are closed and receive a violation letter, they will have the opportunity to notify DEQ of their closed status in the manner outlined above and the violation may be waived.

Timing - In order to receive this sampling waiver, systems will be required to report their closed status to DEQ on a monthly basis until they resume operation. It should not be assumed that after a system notifies DEQ of their closed status they will automatically be granted this discretion each month.