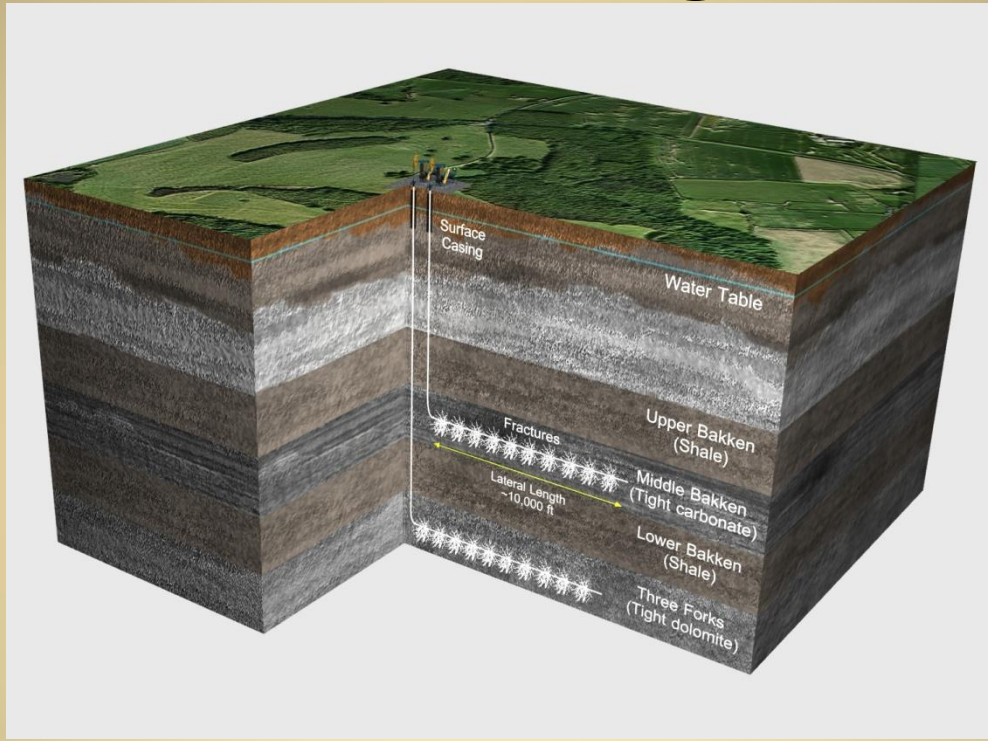
Implications of Mobile Home Courts, RV Parks, and Work Camps for Water and Wastewater Systems

(Or, “I’ve got a job in the Bakken, now where am I going to live?”)

Montana DEQ
Public Water & Subdivisions Bureau

What is Going On?



- Improvement in hydraulic fracturing technology and economy is leading to significant oil development in eastern Montana.
- With the influx of work comes a flood of people with limited places to live.
- To cope, many “temporary” developments are being built. These developments are unlike most things that DEQ has seen over the years.

What do these things look like?

Mobile Home Court, Dawson County

What do these things look like?

RV Parks, Richland County

What do these things look like?

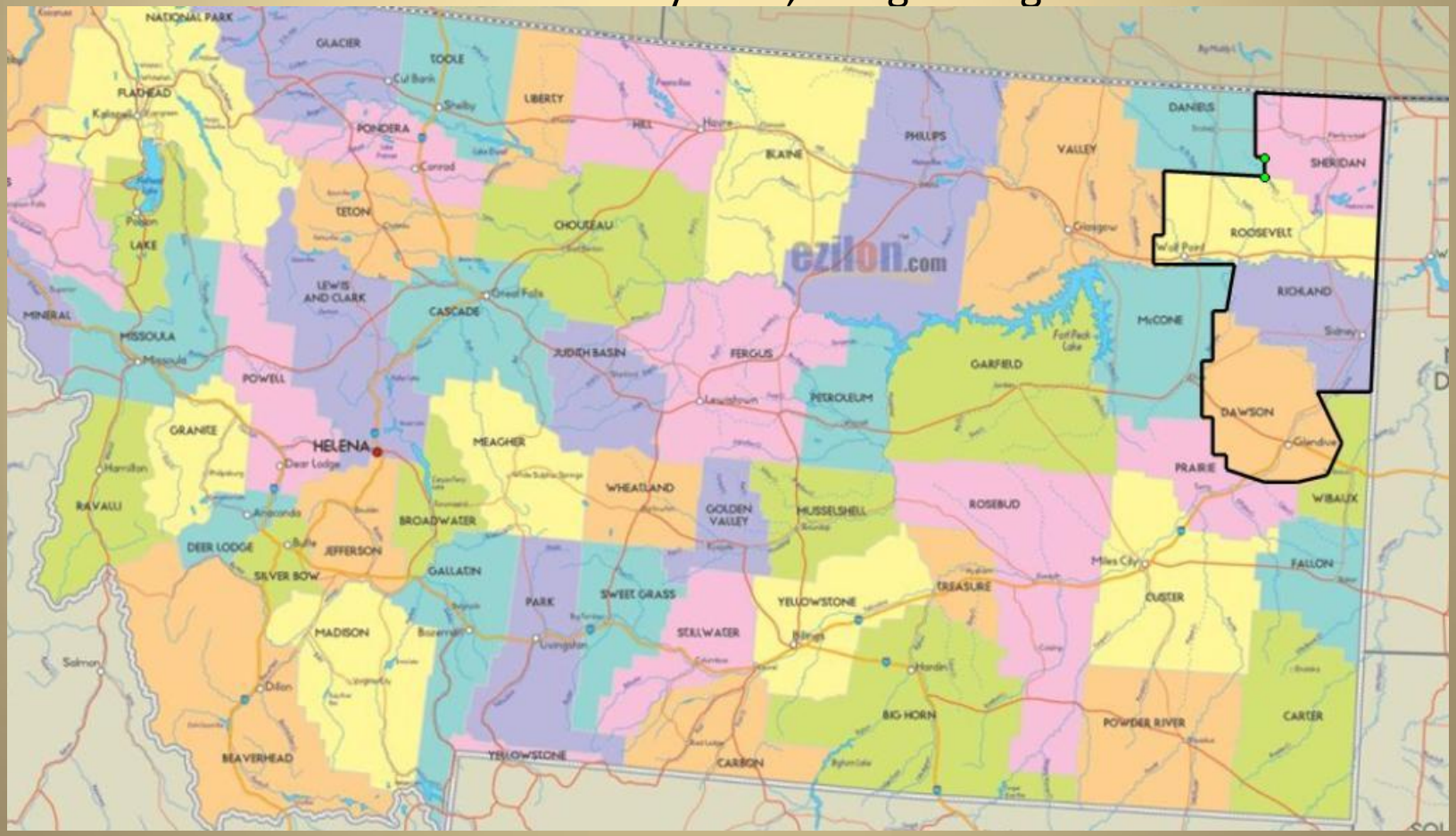
Work Camp, Roosevelt County

What do these things look like?

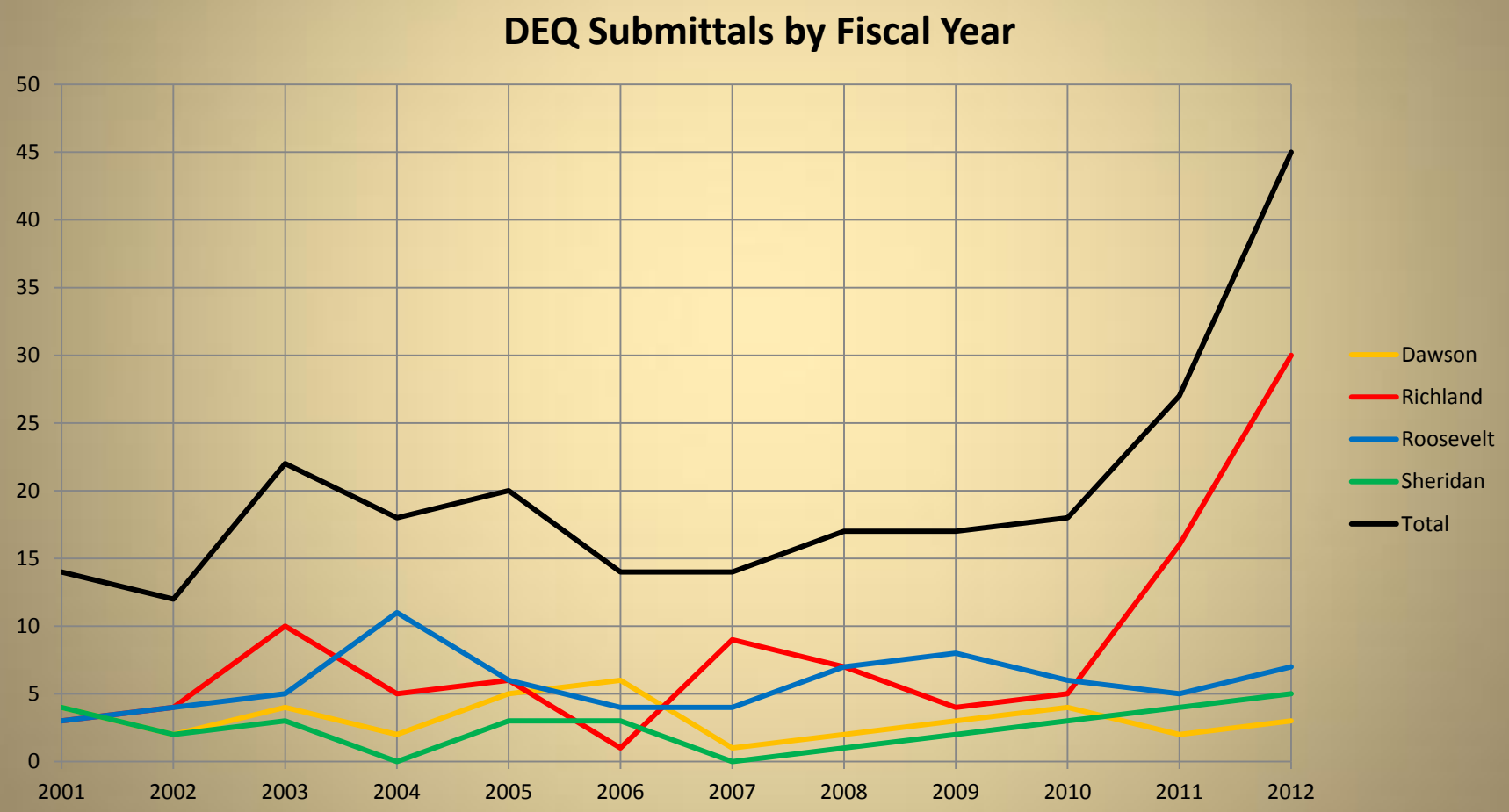
Truck Parking Facility, Richland County

Where is this happening?

So far, it seems to be concentrated in a four county area centered in Sidney…but, it is growing.



Where is this happening?



So, What Are They?

(in terms of regulations)

- In DEQ's world, there are two sets of laws and regulations that they might fall under:
  - Sanitation in Subdivisions Act (MCA 76-4)
  - Public Water Supply Laws (MCA 75-6)

So, What Are They?

(in terms of regulations)

- Mobile Home Courts and RV Parks automatically fall under the Sanitation in Subdivisions Act (MCA 76-4-102 (16) and require review as a <u>subdivision</u> for the following:
  - Water supply (quantity, quality, and dependability),
  - Wastewater (collection, treatment, and disposal),
  - Storm Drainage (e.g. no increase in off-site runoff due to development), and
  - Solid Waste.

So, What Are They?

(in terms of regulations)

- Any system that provides water for human consumption that has at least 15 service connections or that regularly serves at least 25 persons daily for any 60 or more days in a calendar year is, by definition, a Public Water Supply System and requires DEQ review and approval prior to construction or modification.

So, What Are They?

(in terms of regulations)

- Under these definitions, any particular project may be either a subdivision, a public water supply system, both, or neither. Examples:
  - A mobile home court with 8 units is a subdivision, but probably not a PWS.
  - An RV park with 40 units is both a subdivision and a PWS.
  - A truck parking facility with a shower building serving 40 people is a PWS, but not a subdivision.
  - A work camp serving 24 people is neither a subdivision nor a PWS.
- We have seen each one of these in the last six months.

So, What Are They?

(in terms of regulations)

	Sanitation in Subdivisions (MCA 76-4)	Public Water Supply (MCA 75-6)
Subdivision with < 15 lots and < 25 people	Yes	No
Subdivision with ≥ 15 lots or ≥ 25 people	Yes	Yes
Mobile home court with < 15 homes and < 25 people	Yes	No
Mobile home court with ≥ 15 homes or ≥ 25 people	Yes	Yes
RV park with < 15 RVs and < 25 people	Yes	No
RV park with ≥ 15 RVs or ≥ 25 people	Yes	Yes
Work camp with < 15 units and < 25 people	No	No
Work camp with ≥ 15 units or ≥ 25 people	No	Yes
Truck parking area, no facilities	No	No
Truck parking area with facilities such as laundry and showers and potentially serving ≥ 25 people	No	Yes
Existing approved subdivision, previously a PWS but inactive for at least three years	No	Yes

Community Challenges

- Rapid, relatively unexpected growth (ex. Sidney may grow from 5,000 to 10,000 over the next few years).
- Aging infrastructure.
- Systems at or nearing capacity.
- Here today gone tomorrow – how to plan.
- Increasing regulatory burden:
  - Water (SDWA)
  - Wastewater (MPDES discharge limits and time)

Community Challenges

Yep, that's a wastewater lagoon serving the RVs and motel seen in the background. Pretty efficient, huh?

Community Challenges

- Need for more certified operators.
- RV parks, work camps, and truck parking areas are considered transient systems and don’t require a certified operator.
- Mobile home courts and subdivisions are community systems and are required to have a certified operator.
- Certified operators are relatively few in eastern Montana, and these newer systems are scrambling to find help.

Permitting Challenges

- Where do they "fit" in DEQ standards?
  - Mobile home courts and RV parks automatically fall under the Sanitation in Subdivisions Act (MCA 76-4).
  - Fall under the Public Water Supply Laws (MCA 75-6) if they meet the "public" definition.
  - Some developments are not reviewed by DEQ (e.g. "work camps" are not subdivisions and are not public if < 25 people). The consultants have figured this one out!

Permitting Challenges

- How do they "fit" in DEQ standards?
  - Design criteria for mobile homes is based on family-type occupancy.
  - Design criteria for RV parks is based on temporary stays such as overnight campgrounds, not longer term occupancy.
  - Design criteria for work camps is…well, there isn't any. The best approximation we have is a dormitory, no space for rent or lease is created and employer provided housing is exempt from our subdivision act.

Permitting Challenges

- What are they doing for water?
  - Water hauled to individual tanks may be a solution for some RV parks.
  - Water from rural systems such as Dry Prairie is an option in some locations – capacity issues.
  - Connection to municipal services is possible in those locations where capacity exists.
  - Most developments so far are drilling new wells
    - Water quality, quantity, and dependability.
  - Water for drilling and fracking quantity and water rights.

Permitting Challenges

- What are they doing with wastewater?
  - Connection to municipal services is possible in those locations where capacity exists (that might be another problem).
  - Onsite lagoon system is a possibility.
  - Onsite disposal (drainfields) seem to be the most popular option.

Permitting Challenges

- What are they doing with wastewater?
  - Wastewater hauled from individual holding tanks <u>may</u> be an option, but is very difficult to permit.
    - Requires long-term contract with pumper/hauler.
    - Requires long-term disposal location (there's your problem).
    - Local (county) health department may have regulations prohibiting.
  - Availability of a local pumper/hauler is questionable in remote areas where some developments are occurring.
  - Finding a place to dispose of septage is difficult. Most municipal systems are stretched to capacity now, and are not taking hauled wastewater. Those that are require an agreement wherein they can discontinue taking septage on short notice.

Permitting Challenges

- What's wrong with onsite wastewater disposal?
  - Nothing…as long as it is designed correctly.
  - Consideration must be given to both wastewater quantity and strength. The relatively higher organic strength due to lower-flow fixtures can just as easily lead to drainfield failure as too much flow (organic vs. hydraulic overloading).
  - Non-Degradation implications (higher nitrate loading).
  - Onsite systems in fine-grained soils can become very large ($) and may require advanced treatment to meet organic and nutrient requirements (more $).
  - Availability of rock!

Permitting Challenges

Permitting Challenges

- Zombie systems
  - Resurrection of systems that have been vacant since the last oil boom cycle.
  - Systems were approved in the early and mid 1980s, and still have an approval statement on file with the clerk & recorder.
  - Conformance of these systems with current design standards is tricky, to say the least.
  - Check your closet for skeletons – they will haunt you!

Permitting Challenges

- Example of a zombie system: this development was approved and occupied in the early 1980s, then vacated and returned to agricultural land, and is now being occupied again. How does this fit our regulations?

So, What is DEQ Doing?

- Timely (and hopefully consistent) review of submitted applications, plans, and specifications.
- Selective enforcement action for non-compliers.
- Part-time office staff in Sidney and Glendive.
- Series of public meetings, PWS sanitary surveys, and technical assistance visits.

More Information – Contacts

http://deq.mt.gov/wqinfo/pws/PlanReviewEngineer.mcpx

Western Montana:

Steve Kilbreath, PWS Manager

444-3638

skilbreath@mt.gov

Eastern Montana:

Matt Waite, PWS – Billings

247-4455

mwaite@mt.gov

DEQ has prepared a guidance document to aid in permitting associated with the development in eastern Montana; copies are available at the Billings regional office or via email request.