

Emerging Contaminants (EC) in Small or Disadvantaged Communities (SDC) Grant Program

Project Eligibility Guidance

PRIMARY PROJECT ELIGIBILITY REQUIREMENTS FOR EC-SDC GRANT FUNDING

To qualify for an Emerging Contaminants in Small or Disadvantaged Communities (EC-SDC) grant, a public water system (PWS) must serve either a small community, defined as having a population of fewer than 10,000, or a disadvantaged community, as determined by state-defined affordability criteria under the Safe Drinking Water Act (SDWA) Section 1452(d)(3).

Eligible projects must primarily address emerging contaminants in drinking water, with a strong emphasis on per- and polyfluoroalkyl substances (PFAS). However, projects targeting any contaminant listed on the EPA's Contaminant Candidate Lists (CCLs) may also qualify.

Proposed projects must demonstrate a clear public health benefit and will require coordination with the Department of Environmental Quality (DEQ) to ensure eligibility and prioritization. For questions or clarification regarding project or project component eligibility, please contact the DEQ EC-SDC Grant Manager.

Neal Murray
406) 444-3425
Neal.Murray@mt.gov



The following lists are intended to be illustrative and not all inclusive.

EXAMPLES OF *INELIGIBLE* ACTIVITIES/USES OF GRANTS



Consistent with the statutory provisions for the WIIN Act *SUDC grant* program and the DWSRF program, funding for bottled water is not eligible under this EC-SDC grant program. Grant funding may not be used for the following activities:

- Projects whose primary purpose is not to address emerging contaminants.
- Remediation of contaminated groundwater or underlying aquifers.
- Operations and maintenance costs (prohibited by statute).
- Lead service line replacement.
- Replacement of premise plumbing.
- Construction or rehabilitation of dams.
- Activities needed primarily for fire protection.
- Activities needed primarily to serve future population growth.
- Activities that have received assistance from the tribal allotment for Indian Tribes and Alaska Native Villages.
- Costs that are unallowable (e.g., lobbying and alcoholic beverages) under 2 CFR 200 Subpart E – Cost Principles.

The following lists include **examples** of activities that could be funded under each category. These lists are not intended to represent all types of eligible activities.

EXAMPLES OF CATEGORY ACTIVITIES *ELIGIBLE* FOR FUNDING



Workforce development activities as part of EC projects are eligible*

- *Water System A receives funds to install a new treatment system to address PFAS, with which their operator is unfamiliar. They may use funds to train their operator(s) in the operation of the system.*
- *Company B may be contracted to conduct testing and research to identify the presence of an emerging contaminant and the extent of contamination. As part of their funded work, they may train an apprentice in the methods and practices necessary to complete the work, or they may host a class from a local technical training program to discuss the project and practices. The added costs associated with apprentice training or introduced inefficiencies from hosting a class are eligible for funding.*
- *Company C may be contracted to install a new treatment system to address an emerging contaminant. They may train a new employee on the methods and skills required necessary to perform this work.*
- *Water System D receives funds to develop a new source and pump station in order to address an emerging contaminant of concern. They previously had one certified operator, but operational requirements now make it necessary to have two operators. They may use a portion of funds to cover the training and certification of a local resident to be a new operator.*
- *State E uses a portion of its grant funds to host a water careers training event at a high school or community college serving the community that is receiving funds to complete the EC-SDC project.*

* States and PWSs are encouraged to think creatively about how projects may build the size, capability, and diversity of the water workforce. PWSs should contact the DEQ EC Grant Manager for questions of the eligibility of specific workforce-supportive project elements.

Research and Testing**

- Research and investigations to identify the presence, source, or extent of emerging contaminant contamination in water systems or source water, including:
- Monitoring and testing (non-routine).
- Direct technical assistance to public water systems (of any size) and respective source water resources with emerging contaminants and treatment problems which could lead to requests for grant funding.
- PFAS and other emerging contaminants project pre-development activities (technical and engineering expert engagement and planning, partnership development with community-based organizations that have experience conducting community outreach).
- Technical assistance for eligible systems to diagnose emerging contaminants problems at their water systems.
- Post-remediation testing to verify whether contaminant(s) are still present after removal actions have been completed.
- Upgrading Supervisory Control and Data Acquisition (SCADA) system to aid with the detection of emerging contaminants.
- Pilot testing for treatment alternatives.
- Conducting initial, special (non-routine/non-compliance) testing to establish a baseline understanding of a contaminant of concern or operation of newly used technology.

** Research and testing activities do not need to find emerging contaminants to be eligible. Efforts undertaken to determine whether emerging contaminants are present are eligible regardless of the findings.

Planning and Design to Address Emerging Contaminant(s)

- Developing emerging contaminant action plans
- Preliminary engineering reports
- Alternatives analyses
- Preliminary and final design
- Climate and cybersecurity risk assessment to address gaps that may increase levels of emerging contaminant exposure that may cause unintended threats to source waters and/or water treatment systems.
- Energy efficiency analyses
- Source water protection plans and plan updates
- Environmental and archaeological review, including the costs to hire a cultural resources management firm if required.
- Capacity building, administrative support, technical assistance, training, outreach, reports/studies, tools, and other eligible activities
- Permit fees

Treatment of Emerging Contaminant(s)

- Build new treatment facilities with emerging contaminant removal capability.
- Upgrade existing treatment facilities to add new treatment processes such as activated carbon, ion exchange, and reverse osmosis.
- Treatment or protection measures against emerging contaminants in source water.
- Development of a new source (i.e., new/replacement well or intake for a public water system) that addresses an emerging contaminant issue.

Source Water Activities Related to Emerging Contaminant(s)

- Source exploration and new source development.
- Source water protection activities (e.g., developing source water protection plans, well abandonment, etc.).
- Testing water sources through the installation of monitoring wells, equipment, or mapping software to analyze whether or not specifically funding actions/projects have remediated contaminant issue.
- Source water impacted by emerging contaminants, aquifer storage and recovery (ASR) system for water storage (e.g., part of a reclaimed water system), including wells, pumps, pipes, and wellhead structures.
- Implementation of voluntary source water protection activities in delineated drinking water source areas (as defined in SDWA Section 1453) to mitigate EC.
- Implementing protection measures to treat against contamination-impacted source water, or contaminated land and industrial sources that may impact source water, where it is found to be the most cost-effective alternative to respond to and alleviate a vulnerability that would substantially disrupt the ability of the system to provide a safe and reliable supply of drinking water.
- Construction of an extensive water transmission and distribution system that consolidated several smaller public water systems where the source water was impacted by harmful algal blooms and other contaminants, into one regional entity, including areas without public water previously.

Storage

- New storage or replacement/rehabilitation of existing structures as part of an emerging contaminant mitigation project.
- Development of supplemental treatment to finished water storage facilities as a protective distribution “barrier” that prevents contamination of water.

Water System Restructuring, Consolidation, or Creation***

- Planning, negotiations, and public processes necessary to support restructuring, consolidation, partnership, or new system creation due to emerging contaminant concerns.
- Consolidation with another water system that does not have emerging contaminants present or has removal capability.
- Creation of a new community water system to address unsafe drinking water provided by individual (i.e., privately-owned) wells or surface water sources.
- Connection to an existing water system without emerging contaminant contamination.

**** Activities that result in restructured, consolidated, or regionalized systems are eligible even if the water system with which the recipient water system partners or consolidates does not serve a community meeting the definition of small or disadvantaged, or the newly consolidated/regionalized system does not serve a community meeting the definition of small or disadvantaged. Activities resulting in the elimination of a water system serving a small and/or disadvantaged community are eligible.*

Public communication, engagement, and education

- Conducting community stakeholder meetings.
- Shared decision-making processes.
- Establishing public information and reporting web portals.
- Educational support to agencies and partners.
- Development of educational materials and programs.
- Advisory councils/committees to provide research opportunities and mechanisms to improve understanding of emerging contaminants.

References

- U.S. Environmental Protection Agency. *Emerging Contaminants (EC) in Small or Disadvantaged Communities Grant (SDC)*. <https://www.epa.gov/dwcapacity/emerging-contaminants-ec-small-or-disadvantaged-communities-grant-sdc>
- U.S. Environmental Protection Agency. *FAQs: Emerging Contaminants (EC) in Small or Disadvantaged Communities Grant (SDC)*. <https://www.epa.gov/dwcapacity/faqs-emerging-contaminants-ec-small-or-disadvantaged-communities-grant-sdc>
- U.S. Environmental Protection Agency. *SDWA 1459A ECSDC Implementation Manual*. https://www.epa.gov/system/files/documents/2025-06/state-ecsdc_implementation-manual-202505-1.pdf