NUTRIENT WORK GROUP TECHNICAL SUBCOMMITTEE MEETING SUMMARY

JULY 16, 2021

9:30 a.m. Zoom Meeting

ATTENDANCE: NUTRIENT WORK GROUP TECHNICAL SUBCOMMITTEE MEMBERS

Representative & Affiliation	Representing
Michael Suplee (co-chair)	DEQ, Water Quality Standards & Modeling
Rainie DeVaney (co-chair)	DEQ, Surface Water Discharge Permitting
	Section Supervisor
Coralynn Revis (sub. For Dave Clark)	Point Source Discharger: Large Municipal
HDR	Systems (>1 MGD)
Rika Lashley	Point Source Discharger: Small Municipal
Morrison Maierle	Systems with Lagoons
Alan Olson (sub. for Shane Lacasse)	Point Source Discharger: Non-POTW
MT Petroleum Association	
Louis Engels (sub. For Amanda McInnis)	Municipalities
City of Billings	
Matt Wolf	Mining
Sibanye Stillwater	
Rachel Cone (sub. for John Youngberg)	Farming-Oriented Agriculture
Montana Farm Bureau	
Kristin Gardner	Conservation Organization: Local
Gallatin River Task Force	
Guy Alsentzer (sub. for Sarah Zuzulock)	Conservation Organization: Regional
Upper Missouri Waterkeeper	Conservation Organization: Statewide
Guy Alsentzer	Environmental Advocacy Organization
Upper Missouri Waterkeeper	Water or Fishing-Based Recreation
Thor Burbach (sub. for Andy Efta)	Federal Land Management Agencies
U.S. Forest Service	
Tina Laidlaw	Federal Regulatory Agencies
U.S. Environmental Protection Agency	
Jeff Schmalenberg	State land Management Agencies
MT Dept. of Natural Resources and Conservation	
Coralynn Revis	Wastewater Engineering firms
HDR	

NOT IN ATTENDANCE: NUTRIENT WORK GROUP TECHNICAL SUBCOMMITTEE Members

Representative & Affiliation	Representing
Vacant	Point Source Discharger: Middle-Sized
	Mechanical Systems (<1 MGD)
Jay Bodner	Livestock-Oriented Agriculture
Montana Stockgrowers Association	
Pete Schade	Water Quality Districts / County Planning
Lewis and Clark Water Quality Protection District	Departments
Samantha Tappenbeck	Soil & Water Conservation Districts – West of
Flathead Conservation District	the Continental Divide
Dan Rostad	Soil & Water Conservation Districts – East of
Yellowstone River Conservation District Council	the Continental Divide
Julia Altemus	Timber Industry
MT Wood Products Association	

ATTENDANCE: OTHER PARTICIPANTS

Aaron Losing, City of Kalispell

Amelia Flanery, DEQ, Surface Water Discharge Permitting

Amy Steinmetz, DEQ, Water Quality Division Administrator

Brian Heaston, City of Bozeman

Christina Staten, DEQ, Watershed Protection Section

Christine Weaver, DEQ, Surface Water Discharge Permitting

Christy Meredith, DEQ, Watershed Protection Section

Darrin Kron, DEQ, Monitoring and Assessment Section Supervisor

Ed Coleman, City of Helena

Erik Makus, U.S. Environmental Protection Agency, Region 8

Erin Wall,

Galen Steffens, DEQ, Water Quality Planning Bureau Chief

George Mathieus, DEQ, Deputy Director

Hannah New, DEQ, Surface Water Discharge Permitting

Heather Henry, DEQ, Surface Water Discharge Permitting

Jane Madison, DEQ, Water Quality Standards and Modeling Section

Joanna McLaughlin, DEQ, Surface Water Discharge Permitting

John Esp, Montana State Senator

Jon Kenning, Water Protection Bureau Chief

Kayla Glossner, DEQ, Surface Water Discharge Permitting

Kristi Kline, Montana Rural Water Systems

Kristy Fortman, DEQ, Watershed Protection Section Supervisor

Loren Franklin, KC Harvey Environmental

Logan McInnis, City of Missoula

Melinda Horne, DEQ, Surface Water Discharge Permitting

Michael Kasch, HDR

Paul Skubinna, City of Great Falls

Peggy Trenk, Treasure State Resources Association Rickey Schultz, HDR Ryan Sudbury, City of Missoula Tammy Johnson, Montana Mining Association Ted Barber, Meeting facilitator Vicki Watson

MEETING OBJECTIVES

- Understand where Department rules fit into state law
- Define the process for watersheds with multiple permittees
- Follow-up on outstanding topics

MEETING HIGHLIGHTS

- DEQ will conduct preliminary watershed inventories for watersheds with multiple point sources
- Medium-sized rivers accepted as a category
- AMP definition will be finalized by July 28 Nutrient Work Group meeting

A list of meeting action items and discussion topics flagged for future meetings can be found at the end of this summary.

MEETING INITIATION

Ted Barber, meeting facilitator, welcomed everyone to the meeting, reviewed the agenda, introduced DEQ contacts involved, and took roll call of the technical subcommittee (TSC) members. Ted then also went over the ground rules for the meeting.

STATE LAW VS ADMINISTRATIVE RULES VS POLICY

Mike Suplee, DEQ Water Quality Science Specialist, reviewed slides 7, 8, and 9 of **Attachment A** to answer the questions: what are rules, what is the rulemaking process, and how does it fit in? Mike explained that the State Constitution is the supreme law of the state (slide 8). Senate Bill 358 will be contained in state law / Montana Code Annotated (MCA). Subsequently, Administrative Rules of Montana (ARM) are written by departments, which is the process we are undertaking. Once rules are adopted, they have the force of law. Underneath this, there is more detail: written policy and work unit policy. The hierarchy is that each component must be consistent with the one above it (slide 8).

Mike then discussed slide 9 of **Attachment A**: cooperative federalism and federally delegated programs. The Montana Pollutant Discharge Elimination System (MPDES) program is an example of a federally delegated program, which is a mirror of the national program and is consistent with the federal Clean Water Act (CWA). Mike explained that DEQ's main counterpart under the CWA is EPA. Many rules that DEQ adopts must receive EPA review and only become applicable after EPA approval.

Discussion

Guy Alsentzer, Upper Missouri Waterkeeper, asked if DEQ has submitted Senate Bill 358 to EPA for approval. Mike replied that DEQ has not submitted the legislation to EPA, and said that as a general rule, EPA does not take action on state laws. Mike further stated that one of the requirements of SB358 is

eliminating numeric nutrient water quality standards, and DEQ will begin the administrative process for repealing DEQ Circular 12-A in the near future.

Guy also stated that the City of Helena is up for MPDES renewal, and we need clarity from EPA on whether we can move forward with this process. Tina Laidlaw with EPA Region 8 stated that EPA can act on state legislation if it determines it is a water quality standard.

WATERSHEDS WITH MULTIPLE SOURCES

Rainie Devaney, Supervisor of DEQ's surface water discharge permitting program, reviewed slides 10 – 14 of **Attachment A**. Rainie stated that DEQ has begun looking at what permits exist at the HUC 8 scale and how the Department will handle situations where there are multiple point sources. Slide 12 shows the same watershed as slide 11, but with a different scenario: multiple point sources. Slide 13 lays out DEQ's process for addressing this scenario and Rainie asked for thoughts on how this could work. Rainie further stated that DEQ is doing some upfront work to identify watersheds that require a monitoring plan, based on internal records, and conducting a preliminary watershed inventory for watersheds DEQ has identified as having multiple point sources. Rainie also stated that DEQ was originally thinking this would be tied to the permit application process, but renewal application deadlines won't be in sync for each permittee; additionally, the legislation is asking us to look at a watershed-scale.

Rainie stated that slide 14 (draft approach for determining a watershed) was presented at the previous Technical Subcommittee meeting and DEQ wants to acknowledge this draft language is still out there and is happy to receive comments and feedback on it.

Discussion

Rika Lashley, representative of small municipal systems with lagoons, stated there was confusion in the last meeting regarding a watershed used in an adaptive management plan versus a HUC 8-defined watershed and suggested using an alternate word to differentiate between them. Mike responded that it would not be unusual for there to be situations where you might cut off the responsibility before the end of the actual HUC 8 boundary, or cases where responsibility bleeds further down to the next HUC. Rainie stated that HUC 8 is just a starting point for watershed inventories and watershed boundaries will be defined case-by-case for each adaptive management plan.

Matt Wolfe, mining representative, stated he wasn't sure where to find HUC 12 boundaries. Kristy Fortman, Supervisor of DEQ's Watershed Protection Section which houses the TMDL, nonpoint source, and wetland programs, stated that the State Library website will contain this information and that she can also provide assistance, if needed. HUC data can be downloaded here.

Louis Engels, substitute representative for municipalities, noted that he didn't see nonpoint sources mentioned in the slides and asked how we have a watershed approach without considering nonpoint sources. Rainie responded that nonpoint source considerations are included in the watershed inventory, which includes the opportunity to identify stakeholders and partners in the watershed (identifying anyone you can partner with to reduce nutrient loading). Kristy stated that in western Montana, we have quite a few watershed restoration plans that local entities compiled that talk about the various partners in the watershed, and those plans can be found on DEQ's website (https://deq.mt.gov/water/Programs/sw).

Louis then asked if it would be the responsibility of the discharger to quantify the nonpoint source loads in the watershed. Rainie responded that this may depend on what information is available, as DEQ may have nonpoint source contributions already calculated; if this has not occurred, the permittee can work with partners or do some work quantify sources on their own. Kristy further stated that most TMDL documents have load allocations outlined for nonpoint sources, and wasteload allocations provided for point sources; however, not every watershed has a TMDL document for nutrients.

Louis followed up asking if a TMDL was completed for the Yellowstone River and nonpoint source pollution is quantified, how does DEQ see nonpoint sources working with the permittees? Will it be the responsibility of the municipality to force nonpoint source work? Kristy responded that all nonpoint source restoration work is voluntary; however, there are many active groups throughout the state that are already addressing this, including other agencies like NRCS. There is a system in place through conservation districts and watershed groups to work with producers, homeowners with septic tanks, etc. DEQ has also started a statewide campaign to reduce nonpoint source pollution, with the goal of helping the public understand their contributions and what they can do to help. Rainie also stated that she hears the concern and hesitation and thinks DEQ can be helpful and serve a vital role in making those connections and fostering relationships.

Matt Wolfe stated he is concerned about the size of watersheds defined under the adaptive management program and that we could be biting off more than we can chew if the larger HUC 8 boundary is used. For example, the Upper Yellowstone HUC is very large, which includes the Boulder mine, and goes from the Yellowstone National Park boundary to Reed Point. Matt asked if the Boulder River TMDL was conducted at the HUC 12 level. Kristy responded that generally TMDL planning areas follow HUC 8 boundaries, but not always. The Boulder River TMDL is in the Boulder-Big Timber TMDL Planning Area, which is a subset of the Upper Yellowstone HUC 8 boundary. Kristy also stated that we are in the planning stages of developing TMDLs for the Yellowstone River; however, DEQ will only be looking at the mainstem of the river and will not be writing TMDLs for the tributaries at this time. Darrin Kron, Supervisor of DEQ's monitoring and assessment section, stated that the data collected during this effort can lead us to what tributaries we should be looking at for future work. Currently, the Clarks Fork of the Yellowstone is sticking out right now as a future project and there are interested stakeholders in this area.

OUTSTANDING TOPICS

Rainie went over several topics that are outstanding from prior meetings.

AMP Definition and AMP Flowchart

Discussion was had over submitted edits to the definition of adaptive management program (AMP) (slide 17 of **Attachment A**). Rika explained that monetary means direct cost to a community, such as operation and maintenance costs, monitoring associated with implementing the AMP, treatment costs, etc., and that environmental costs are indirect costs.

Rainie stated that DEQ will address the concepts Rika expressed and will wrap up the definition and have a final version for the next Nutrient Work Group meeting.

Louis stated displeasure at removing "nonpoint sources" from the definition. Rainie explained that the revised definition still considers nonpoint sources. Louis also asked if SB358 gives DEQ the authority to regulate nonpoint sources. Rainie responded that she does not believe SB358 provides new authority to

regulate nonpoint sources. Louis also asked if DEQ agreed it is needed for a watershed approach. Rainie responded that nonpoint source contributions are a critical piece in analyzing nutrient sources and should be quantified, but also acknowledged that work by nonpoint sources is voluntary.

Matt Wolfe and Alan Olson stated they agreed with not spelling out "nonpoint source" in the definition since the state does not have the authority to regulate nonpoint sources.

Rainie stated that DEQ has not received additional input on the AMP flowchart. She further stated that time isn't an essential component of the flowchart, but it would be helpful to receive feedback to know conceptually how the process will work (**Action**).

Roles and Responsibilities

Rainie stated that the adaptive management program will remain a permittee-driven process; however, DEQ is available to provide support and resources, including training, monitoring procedures and protocols, identifying data sources, and for relationship building.

Rika asked if it would make sense for DEQ to take a more active role in getting the process started for very small communities – along the same lines of what would be done for watersheds with multiple point sources. Rainie said we can start to talk about prioritizing watersheds.

Medium Rivers Category

DEQ asked for a confirmation from the technical subcommittee on including this category. Consensus was to include this as a category, along with wadeable streams and large rivers. Mike Suplee will create a draft definition of a medium river (**Action**).

Groundwater

Rainie stated that groundwater language was added to the AMP details document that supports the flowchart, and this updated language is available on Teams.

Teams Platform Feedback

DEQ requested feedback on how Teams is or isn't working for the group in being able to provide feedback, as not a lot of traffic has been observed on the site. A question was asked about folder organization, and it was stated that the folders are confusing.

PUBLIC COMMENT

Public comment was taken at the end of the meeting. There were no comments or questions.

CLOSING

Ted reminded the group the next technical subcommittee meeting is August 3 at 1:30 p.m., and the next Nutrient Work Group meeting is July 28 at 9:00 a.m. Galen Steffens, DEQ Bureau Chief of the Water Quality Planning Bureau, thanked the group for their participation. She encouraged people to follow up with her if anybody has any problems accessing the Teams page. Ted thanked the group and closed the meeting.

SUMMARY OF MEETING ACTIONS

The tables below include items from all previous meetings. New and updated items are in bold font.

Inco	Incomplete Action Items			
#	Action	Who	Status	
1	Provide feedback from the TSC about the time component in the flow chart	TSC	In progress	
2	Update the flowchart and supporting materials based on TSC feedback	Rainie DeVaney, Mike Suplee	In progress	
3	Receive feedback from TSC on time component of each flowchart step.	TSC	In-progress	
4	Receive written comments from League	Amanda McInnis	Status Unknown	
5	Define what P prioritization means	DEQ and TSC	Pending	
6	Define roles and responsibilities of DEQ and permittees for AMP process	DEQ	In-progress	
7	Identify and define what is needed to determine how far upstream and downstream monitoring should occur for a point source	TSC	In-progress	
8	Medium rivers definition	Mike Suplee	In-Progress	

Complete Action Items			
#	Action	Who	Status
1	Distribute the flowchart and supporting materials to the TSC in a format to provide comments/track changes	Rainie DeVaney, Mike Suplee	Complete
2	Consider other measures that may trigger action (Box 7 of flowchart)	TSC	Complete
3	Clarify in the supporting documents that the narrative standards are those referenced in the Administrative Rules of the Montana of the State of Montana.	Rainie DeVaney, Mike Suplee	Complete
4	Define the overall work for the AMP by the June 23 Nutrient Work Group meeting	TSC	Complete
5	Provide information to the TSC on how to get on the agenda for a future meeting	Rainie DeVaney, Mike Suplee	Complete
6	Schedule two TSC meetings between each Nutrient Work Group	Rainie Devaney, Mike Suplee	Complete
7	Set up Teams TSC collaboration site. Send invite email. Post comments received from TSC members and draft DEQ documents	Moira Davin, Christina Staten	Complete
8	Update AMP definition based on TSC feedback. Share out to TSC.	Rainie DeVaney, Mike Suplee	Complete
9	Decide whether medium sized rivers should be broken out	TSC	Complete
10	Add the draft approach for determining watersheds to Teams for feedback from TSC	Mike Suplee	Complete
11	Reorganize technical subcommittee Teams folders so they are more intuitive	DEQ	Complete

Questions/Topics Flagged for Future Discussions	
	Date
Tina asked when will the Monitoring Plan be submitted (is that part of the permitting application)?	6/10/21
When will the public get to review what is being proposed for monitoring? Will DEQ have	
monitoring guidance?	

Questions/Topics Flagged for Future Discussions	
	Date
How exactly the public process is incorporated into the different steps in the AMP need to be worked out and flagged that for future discussion.	6/10/21
Consider developing a case study to guide the MT process.	6/10/21
Tina noted, there is talk about doing some downstream analysis but it could also be that elevated concentrations of nutrients could contribute to an issue that just hasn't yet been manifested, so EPA will be curious how the state plans to address that piece.	6/10/21
Discussion on the nexus between TMDLs and AMPs.	6/10/21
Tina asked where does the NPDES permit application process fit in to this whole process?	6/10/21
Define roles and responsibilities of DEQ and permittees in AMP process	6/21/21
How will DEQ apply existing TMDLs- what is the interplay of AMPs and completed/approved AMPs	6/21/21
Define P prioritization and what is intended as site-specific factors.	6/21/21

ATTACHMENT A: JULY 16, 2021 NUTRIENT WORK GROUP TECHNICAL SUBCOMMITTEE MEETING PRESENTATION SLIDES



Nutrient Work Group Technical Subcommittee Session Four

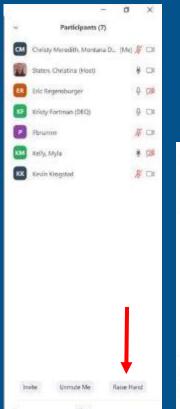
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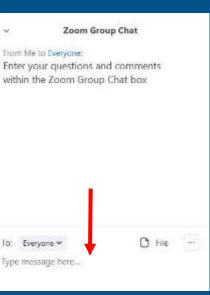


Welcome!

- Please keep your microphone muted until called on
- TSC Members may participate during discussions
- Please reserve public comment until the end
- *6 unmutes your phone
- State your name and affiliation before providing your comment
- Enter questions in the chat box at any time
- Turning off your video feed provides better bandwidth
- Please sign-in to the chat box with name and affiliation

























Agenda

Meeting Goal: Finalize defining AMP watershed extents

9:35 a.m. Welcome

9:40 a.m. Introductions (Ted Barber, Facilitator)

9:45 a.m. Review MT State Law vs MT Administrative Rule vs Policy (Mike Suplee)

10:05 a.m. Watersheds with Multiple Sources (Rainie DeVaney)

Discussion and feedback

10:25 p.m. Outstanding Topics (Rainie DeVaney and Mike Suplee)

- AMP definition and AMP flowchart
- Roles and Responsibilities
- Confirm medium rivers category
- TEAMS platform feedback

11:00 pm Open Public Discussion & Close of Meeting

- Discussion of next meeting topics and next subcommittee meeting
- Meeting close



Introductions

Facilitator

Ted Barber

DEQ Staff

- Michael Suplee, Water Quality Science Specialist
- Rainie DeVaney, Discharge Permitting Section Supervisor
- Amy Steinmetz, Water Quality Division Administrator
- Jon Kenning, Water Protection Bureau Chief
- Galen Steffens, Water Quality Planning Bureau Chief
- Myla Kelly, WQ Standards & Modeling Section Supervisor
- Kristy Fortman, Watershed Protection Section Supervisor
- Darrin Kron, WQ Monitoring & Assessment Section Supervisor



Introductions

Nutrient Work Group Technical Subcommittee Members

Interest Group	Representative	Substitute
Point Source Discharger: Large Municipal Systems (>1 MGD)	Dave Clark	
Point Source Discharger: Middle-Sized Mechanical Systems (<1 MGD)	Vacant	
Point Source Discharger: Small Municipal Systems with Lagoons	Rika Lashley	
Point Source Discharger: Non-POTW	Shane Lacasse	
Municipalities	Amanda McInnis	Louis Engels
Mining	Matt Wolfe	
Farming-Oriented Agriculture	John Youngberg	
Livestock-Oriented Agriculture	Jay Bodner	
Conservation Organization - Local	Kristin Gardner	
Conservation Organization – Regional	Sarah Zuzulock	
Conservation Organization – Statewide	Sarah Zuzulock	
Environmental Advocacy Organization	Guy Alsentzer or Sarah Zuzulock	
Water or Fishing-Based Recreation	Guy Alsentzer or Sarah Zuzulock	
Federal Land Management Agencies	Andy Efta	Thor Burbach
Federal Regulatory Agencies	Tina Laidlaw or Erik Makus	
State Land Management Agencies	Jeff Schmalenberg	
Water Quality Districts / County Planning Departments	Pete Schade	None
Soil & Water Conservation Districts – West of the CD	Samantha Tappenbeck	
Soil & Water Conservation Districts – East of the CD	Dan Rostad	
Wastewater Engineering Firms	Coralynn Revis	
Timber Industry	Julia Altemus	

Ground Rules

- Speak one at a time—refrain from interrupting others.
- Wait to be recognized by the facilitator before speaking.
- Facilitator will call on people who have not yet spoken before calling on someone a second time for a given subject.
- Share the oxygen—ensure that all members who wish to have an opportunity to speak are afforded a chance to do so.
- Be respectful towards all participants.
- Listen to other points of view and try to understand other interests.
- Share information openly, promptly and respectfully.
- If requested to do so, hold questions to the end of each presentation.
- Remain flexible and open-minded, and actively participate in meetings.





Department Rules: Where do they fit in?

The Three Coequal Branches of State Government

Legislative—makes the laws; MT legislature meets every two years, January-May

Executive—executes and administers the laws; DEQ is an executive branch agency, director serves at the pleasure of the Governor

Judicial—interprets the laws, particularly when there is disagreement about meaning and application of state statutes and administrative rules



Department Rules: Where do they fit in?

The Hierarchy of State Law (in order of rank)

None of the components should be in opposition/inconsistent with those above it

State Constitution

State Law (passed by Legislature, signed by Governor); in the Montana Code Annotated (MCA)

Administrative Rules (Department; ARMs). Have the force of law once adopted.



Work Unit Policy (written or understood)



Department Rules: Where do they fit in?

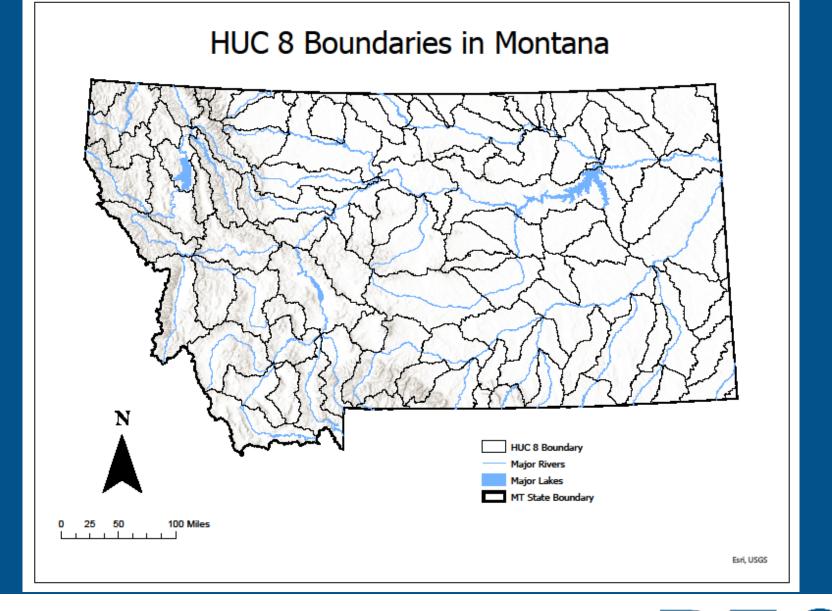
Federal Clean Water Act (CWA)

Sets minimum bar for water quality protection nationally

Cooperative Federalism Montana interacts cooperatively with the federal government to solve common problems. EPA is our main federal counterpart. Many water quality standards rules we adopt must receive EPA review and only become applicable for CWA purposes after EPA approval

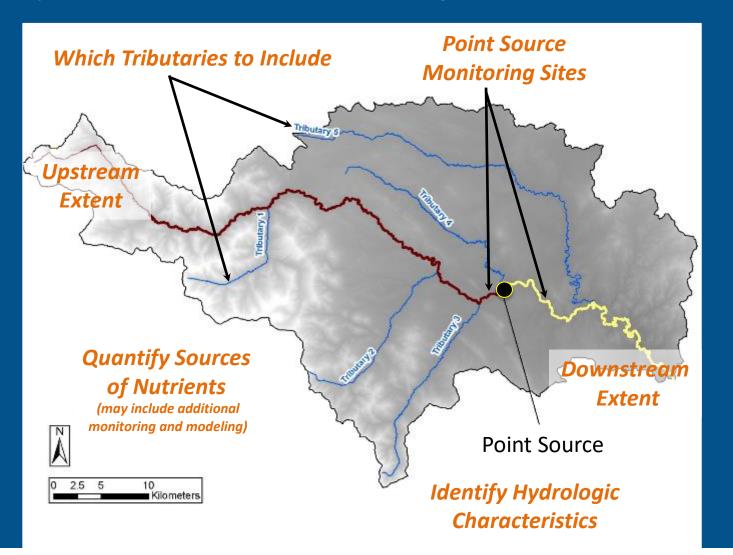
Federally delegated Montana holds primacy to implement some Clean Water Act programs. Montana must implement these federally delegated programs consistent with applicable federal regulations.





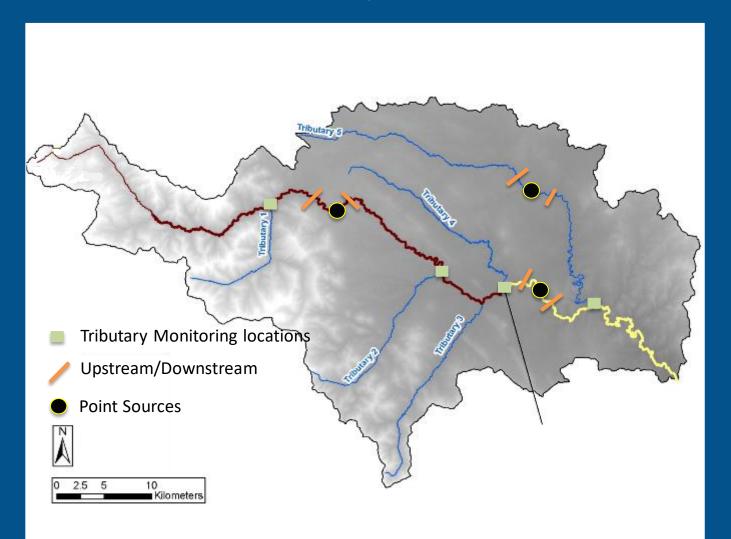


Key Considerations When Defining an AMP Watershed





Watersheds with Multiple MPDES Permittees





Watersheds with Multiple MPDES Permittees

- DEQ will identify each watershed (likely Hydrologic Unit Code 8) that requires a watershed monitoring plan
- DEQ will notify point sources in the watershed and may provide a preliminary watershed inventory of sources based on DEQ records
- DEQ will provide a deadline for submission of the watershed monitoring plan



Draft Approach for Determining Watershed

- Under an adaptive management plan the watershed must be defined, at a minimum, by its upstream extent, its downstream extent, the principal tributaries included, and the main sampling locations to be monitored for purposes of assessing sources and the direct effects of the point source
- Proposed watersheds will be reviewed by the department. The department will (a) approve the watershed as described, or (b) make recommendations for an alternative layout. The department will have final review and approval on all AMP watersheds
- For purposes of monitoring and assessment, the point source receiving waterbody will be identified as a wadable stream, medium river? or large river





Technical Subcommittee Discussion and Feedback



Outstanding Topics

- AMP definition and AMP flowchart
- Roles and Responsibilities
- Confirm medium rivers category
- How is TEAMS working for the group?



AMP Details Document

Draft Definition

Adaptive Management Program means a watershed-scale system that protects water quality from point and nonpoint sources the impacts of nutrients sources by: (a) prioritizing phosphorus reduction while accounting for site specific conditions, (b) allowing for nutrient sources to be addressed incrementally over time by incorporating flexible decision-making which can be adjusted as management actions and other factors become better understood, (c) reasonably balancing evaluating all factors impacting a waterbody while considering the relative monetary and environmental cost of treatment options, their feasibility, and their expected water quality improvement, (d) documenting identifying specific nutrient reduction requirements, and (e) setting as its goal the protection and achievement of beneficial uses of the waterbody.

Outstanding Topics

- AMP definition and AMP flowchart
- Roles and Responsibilities
- Confirm medium rivers category
- How is TEAMS working for the group?



Technical Subcommittee Discussion and Feedback





Public Comment & Close of Meeting



Next Meetings

- Nutrient Work Group Session 3
 July 28, 2021, 9-11 AM
- Technical Subcommittee

Aug. 3, 2021, 1:30 – 3:30 PM

Topic: Response variables and thresholds

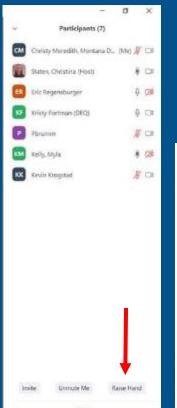


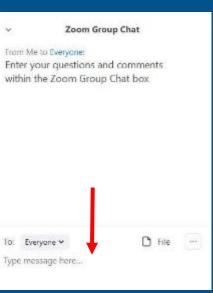


Questions/ Comments

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- Please keep your microphone muted until called on
- If calling by phone, press*6 to unmute
- State your name and affiliation before providing your comment

























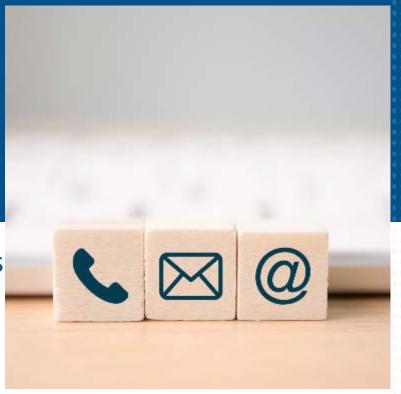
Thanks for Joining Us

Contact:

Mike Suplee, MSuplee@mt.gov Rainie Devaney, RDevaney@mt.gov

To submit comments or questions





http://deq.mt.gov/water/resources

