

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
ONGOING IMPLEMENTATION OF CAPACITY DEVELOPMENT REQUIREMENTS
FOR NEW COMMUNITY AND NON-TRANSIENT NON-COMMUNITY WATER SYSTEMS
AND FOR EXISTING WATER SYSTEMS RECEIVING SRF LOANS
JULY 1, 2022 THROUGH JUNE 30, 2023**

INTRODUCTION

The Montana Department of Environmental Quality (MDEQ) has the statutory authority to review and approve new public water systems or modifications of existing systems. MDEQ also has primacy under the Safe Drinking Water Act to monitor public water systems for bacteriological, chemical and radiological constituents. MDEQ has adopted rules and design circulars governing the design, construction and monitoring of public water systems.

In accordance with the 1996 amendments to the Safe Drinking Water Act (Public Law 104-182), MDEQ developed and adopted capacity development regulations for new community and non-transient non-community water systems commencing operation after October 1, 1999. MDEQ inserted capacity requirements into the department's public water supply rules and design circulars referenced by those rules. After review and approval by the Board of Environmental Review (BER), final rules became effective on September 10, 1999.

Montana's Drinking Water State Revolving Fund Loan Program received EPA approval and was awarded its first (FY 1997) capitalization grant on June 30, 1998. Since then the program has provided loans to water systems at below-market interest rates for the construction of public health-related infrastructure improvements. As of June 30, 2023, the program has closed on 506 community loans throughout the state. This total includes July 1, 2022, through June 30, 2023, where the program closed 15 additional loans to 9 water systems.

Section 1452(a)(3) of the 1996 amendments to the Safe Drinking Water Act establishes that no assistance from the Drinking Water SRF shall be provided to a public water system that "does not have the technical, managerial, and financial capability to ensure compliance with the requirements of this title" or is in significant non-compliance with a national primary drinking water regulation or variance. Section 1452(a)(3) further specifies that a system without adequate capacity or in significant non-compliance *may* receive SRF assistance if the following provisions are met:

1. For those systems that are in significant noncompliance, the use of the assistance ensures compliance; and
2. For those systems without adequate capacity, "the owner or operator of the system agrees to undertake feasible and appropriate changes in operations (including ownership, management, accounting, rules, maintenance, consolidation, alternative water supply, or other procedures) if the State determines that the measures are necessary to ensure that the system has the technical, managerial, and financial capability to comply with the requirements of this title over the long term."

BASIS OF AUTHORITY

MDEQ is granted legal authority for capacity requirements by Title 75, Chapter 6, MCA, Public Water Supplies, Distribution and Treatment. Section 75-6-103 specifically grants the BER authority to adopt rules for the following:

1. the siting, construction, operation and modification of a public water supply system or public sewage system; and
2. the review of financial viability of a proposed public water supply system or public sewage system, as necessary to ensure the capability of the system to meet the requirements of 75-6-103.

Another important provision of this statute is that the BER and MDEQ are granted the authority to take enforcement actions against non-complying systems, along with the ability to assess administrative, civil or criminal penalties.

MDEQ has rules and design circulars that establish parameters for the design, construction, operation and monitoring of public systems. Title 17, Chapter 38, Sub-chapter 1, Administrative Rules of Montana (ARM), provides the criteria for the design and construction of a public water supply. Title 17, Chapter 38, Sub-Chapter 1 references the design circulars used for public water supply systems: DEQ 1 is the design circular for community water systems and DEQ 3 is the design circular for non-community water systems. The design circulars provide standards for the siting and design criteria for new or modified public water systems. Title 17, Chapter 38, Sub-Chapter 2, ARM, contains the criteria for bacteriological, chemical and radiological requirements for public water systems. This portion of the rule provides monitoring frequency requirements, maximum contaminant levels for regulated contaminants, treatment requirements and reporting procedures for monitoring results. MDEQ currently maintains a computer database of the distribution, source, entry point and monitoring information. This database is updated whenever new monitoring results are received, modifications to the system are constructed or violations occur.

MDEQ has adopted cross-connection rules (Title 17, Chapter 38, Sub-Chapter 3, ARM) that specifically state all cross-connections in a public water system must be eliminated either through disconnection to the system or installation and maintenance of an approved backflow prevention assembly.

CAPACITY DEVELOPMENT CONTROL POINTS

As mentioned earlier, MDEQ elected to place capacity development requirements in existing rules and circulars. The major rule changes that include capacity requirements are as follows:

1. Section 17.38.101(4)(g) was modified to require MDEQ notification when a change of ownership occurs.
2. Section 17.38.101(7) was modified to require completion of construction, alteration or extension of a public system within three years of approval. This section formerly required that construction, alteration or extension of a public system commence within two years. This modification ensures that new systems or system modifications are installed based on the most current design criteria and technology.
3. Section 17.38.101(9) was modified to require MDEQ notification prior to a public system being operated. This section further requires that as-builts for the new system or portion of the new system constructed to date, be furnished to MDEQ within 90 days after the system becomes operational. These modifications allow MDEQ to have a more accurate inventory of operating public systems.
4. Section 17.38.101(10) was added to require proper certification to MDEQ that the system was built in accordance with the approved plans.

These sections provide MDEQ with control points on new water systems and result in a more accurate database of new public water systems.

In addition to the rule modifications, MDEQ added capacity development requirements to its existing design circulars, DEQ 1 and DEQ 3. MDEQ requires that proposed public systems provide an engineering report, plans and specifications for review and approval. Both of these circulars were modified to include criteria for new technologies available for water systems. The following capacity development requirements were included in each circular:

1. A groundwater under the direct influence of surface water assessment must be performed for each new groundwater source. MDEQ created a new circular, PWS-5, which describes the information necessary for performing this assessment.
2. A source water assessment plan must be developed for each new source. MDEQ created a new circular, PWS-6, which describes the information necessary for performing this assessment.
3. New systems must provide detailed information on ownership, management, operation, maintenance and financing of the new system. MDEQ requests specific capacity information in the appendices of DEQ 1 and DEQ 3. Similar information is requested for non-transient non-community systems.

MDEQ has developed a guidance manual for applicants to assist in compiling the information necessary to meet the capacity development requirements. The manual is available in hard copy and electronically.

IMPLEMENTATION OF A FULLY FUNCTIONING PROGRAM

After the state's capacity development rules became effective on September 10, 1999, MDEQ provided training to consultants, developers and city-county officials. The training focused on assembling the necessary information in the proper format to comply with the capacity development rules, particularly groundwater under the direct influence of surface water assessment, source water assessment and financial information. These three facets of the capacity development rules are the most labor-intensive requirements for consultants and developers to address.

MDEQ tracks the progress of new community and non-transient non-community water systems throughout the approval process and during operation of the system. MDEQ currently has a computer database system that contains the following information for each active public water supply system in the state:

1. owner, owner's address, contact person, operator and size of system,
2. source and entry point information,
3. sampling profile for each entry point,
4. sampling results for all regulated contaminants,
5. remarks and history information of the system, such as system improvements or violations, and
6. results of sanitary surveys.

As part of the capacity requirements, information on system startup, records of as-built plans and certification, groundwater under the direct influence of surface water assessment and source water assessment are included in the database for each new community and non-transient non-community water system. MDEQ personnel routinely query the database in order to ensure that new systems have met all applicable capacity development requirements. MDEQ has the authority to assess penalties against systems that fail to comply with capacity development requirements.

MDEQ's Operator Certification Program works closely with the Public Water Supply and DWSRF programs to ensure that all new community and non-transient non-community water systems have appropriately certified operators. As in the past, the Operator Certification Program continues to be a strong component in the state's capacity development strategy.

MDEQ's Source Water Protection Program also contributes to new water system capacity through its involvement in the review and approval of source water assessment plans for new water sources. The Source Water Protection Program staff identifies new sources at risk due to geological conditions, source construction or potential contaminant sources and ensures that adequate treatment is provided at those sources. The efforts of the Source Water Protection Program have resulted in improved source water protection and proactive water treatment requirements.

As part of its plan review procedures, MDEQ's Public Water Supply Program ensures that new systems demonstrate adequate capacity. EPA guidance excludes from this requirement those systems with pre-existing infrastructure, that is, those systems with infrastructure constructed or approved for construction before September 10, 1999.

IMPLEMENTATION OF ASSET MANAGEMENT §1420(c)(2)(a-f)

America's Water Infrastructure Act of 2018 (AWIA) amended Section 1420(c) to add asset management into their state capacity development strategies. AWIA contains the following requirements: (1) encourage public water supplies (PWSs) to create asset management plans (AMPs); (2) assist public water systems in training to implement AMPs; (3) include a summary of these efforts in a triennial capacity development report to the governor. Consistent with this statutory change, state drinking water programs are expected to revise their capacity development strategies to include a description of how asset management will be promoted through addressing the five-core-question framework of asset management. This provision aligns with EPA's strategic measure of reducing the number of public water supply systems with health-based violations by ensuring long-term sustainability of the public water supply systems.

Montana asset management efforts include (but not limited to):

- Implement and support a designated Capacity Development Coordinator position in MDEQ PWS. The long-term goals of this position will direct capacity development efforts with emphasis on asset management, serve as the technical assistance specialist for PWSs with persistent issues, and continue to develop Montana's involvement in the Area Wide Optimization Program (AWOP).
- The existing Capacity Development Coordinator has earned an Asset Management Certification through Virginia Tech.
- Asset management questions have been incorporated into the capacity development self-assessment form.
- Table A-1 (financial page) has been placed back into DEQ-1 and is referenced in DEQ-3.

- A capacity development webpage is under construction, and includes asset management tools and resources. The page is now accessible to the general public.
- DEQ PWS will create a drop-box within the capacity development webpage for systems to submit their asset management plans for professional review.
- MDEQ PWS Field Staff must discuss CD/AM with the system representative, verify if the system has an asset management plan, present the representative with a business card that has the Capacity Development Coordinator contact information on the back, and note CD/AM contact within the sanitary survey inspection reports.
- Expansion of the Operator Certification Program to include facility-based training water and wastewater opportunities for CD and AM centered training through approved providers. Creation of an asset management plan must be emphasized. Area technical assistance providers were encouraged to develop asset management knowledge through additional formal training.
- Continue to offer capacity development training opportunities with an emphasis on asset management tools throughout Montana, and encourage area technical assistance providers to promote system specific asset management plans through field visits and annual training events.

SUMMARY OF ASSESSMENTS OF TECHNICAL, FINANCIAL AND MANAGERIAL CAPACITY OF SYSTEMS SEEKING DWSRF ASSISTANCE

Between July 1, 2022, and June 30, 2023, Montana's DWSRF Program issued loans to 15 water systems throughout the state. A technical, financial and managerial capacity assessment was conducted on each system prior to loan commitment. The results of these assessments are summarized in the following table:

STATEWIDE CAPACITY REVIEWS		Totals	System type		System size (population served)		
			CWS	TNC	<1000	1000-3300	>3300
Passed		9	9	0	5	2	2
Failed		0	0	0	0	0	0
Failed – requiring restructuring		0	0	0	0	0	0
Systems with ETT ≥ 11 requesting assistance	Funded	0	0	0	0	0	0
	Not funded	0	0	0	0	0	0

All systems provided with DWSRF funding between July 1, 2022, and June 30, 2023, were community systems. Of the total, five of the systems had populations less than 1000, two had a population from 1000 to 3300, and two had populations exceeding 3300.

MDEQ has not made and is not planning to make any changes in the capacity assessment methodology used for determining the eligibility of water systems seeking DWSRF assistance.

NONCOMPLIANT SYSTEMS RECEIVING DWSRF ASSISTANCE

In December 2009 EPA's Office of Enforcement and Compliance Assurance released the Enforcement Response Policy, an enforcement targeting approach that identifies all unaddressed regulatory violations at a public water system. In 2013 this new approach replaced the prior strategy, which focused on noncompliant water systems on a rule-by-rule basis. The Enforcement Response Policy is supported by the Enforcement Targeting Tool, which assigns a point value to individual violations at each system to help prioritize drinking water systems with the most serious, numerous, or long-lasting unaddressed violations for possible enforcement. Drinking water systems with Enforcement Targeting Tool scores equal to or exceeding 11 are considered a high priority for enforcement action.

Of the 9 systems receiving DWSRF assistance between July 1, 2022, and June 30, 2023, none had an Enforcement Targeting Tool score equal to or exceeding 11 at the time of loan issuance.

MDEQ has not made and is not planning to make any changes in the procedures used for assessing whether DWSRF assistance will ensure compliance of water systems.

SYSTEMS REQUIRED TO UNDERGO RESTRUCTURING IN ORDER TO RECEIVE DWSRF ASSISTANCE

Of the 9 systems receiving DWSRF assistance between July 1, 2022, and June 30, 2023, none were required to undergo restructuring in order to receive DWSRF assistance.

MDEQ has not made and is not planning to make any changes in the assessment procedure used to determine whether water systems seeking DWSRF assistance need to undergo restructuring. This procedure has undergone public review and is documented in the state's DWSRF operating agreement.

New system (Com, NTNC) list (last three years) for the 2023 Annual Capacity Development Report for Montana

PWSID	PWS Name	First Reported to SDWIS	Highest ETT (if over 11 what qtr did the ETT rtn to <11)	Discovered or planned	TMF self -assessment or TMF assistance - provide narrative
MT0005067	2 GRAMMA'S HOUSE DAY CARE	5/13/2021	1	Planned EQ19-1055 20-2406	New owner packet PbCu Consumer Notice resolved
MT0005072	AMSTERDAM VILLAGE LOTS 11 & 12 HOA	11/16/2022	0		New owner packet 3/14/23
MT0005006	B & M ZOO SUBDIVISION	2/16/2021	2	Planned EQ17-1098 EQ18-1966	New owner packet 2/11/2021 Sanitary survey 3/24/2021 CL2 reporting
MT0005095	BEARTOOTH SPRING WATER	8/15/2022	2		2023 SS – older violations were issued before they served water
MT0004833	BIG ROSE COLONY	8/13/2020	0	Planned EQ13-1799	New owner packet 7/20/2020 Sanitary survey 9/22/2021
MT0005090	BLUNDERBUSS	12/20/2021	3	Planned EQ20-2331	Sanitary survey 5/27/2022
MT0005117	BRIDGER BREWING THREE FORKS	11/16/2022	0	Planned EQ19-2111 EQ21-1580	Operating prior to final approval. New system packet. GW determination. Due for SS 2023.
MT0005038	BUFFALO MOUNTAIN SUBDIVISION	5/13/2020	0	Planned EQ07-1393	New owner packet 4/14/2020 Sanitary survey 3/16/2021 TA visits 12/21/20 & 8/9/21
MT0005060	CASITAS DEL RIO	11/19/2020	8	Discovered CC to 0000229	Sanitary survey 9/23/2020 New owner packet 6/1/2022
MT0005044	CURIOUS MINDS MONTESSORI PRESCHOOL	9/30/2020	1	Planned EQ20-1467	New owner packet 9/14/2020 Sanitary survey 7/28/2021
MT0005024	DISCOVERY KID ZONE MONTESSORI	8/13/2020	0	Planned EQ19-1788 EQ20-1379 EQ20-1380	New owner packet 7/20/2020 Sanitary survey 1/21/2021
MT0005047	DIVINE MERCY ACADEMY UNAPPROVED	5/13/2020	11 (21Q1) <11 (21Q2)		School connected to City of Belgrade and PWSID 5047 was inactivated on 3/25/2021.
MT0004994	FAIRFIELD MENNONITE CHURCH	9/30/2020	1	Planned EQ18-2010	Sanitary survey 5/14/2021
MT0004960	HOME 40 PUBLIC WATER SUPPLY	5/13/2021	5	Planned	New owner packet 4/20/2021

				EQ17-1625 EQ17-1792	Sanitary survey 6/8/2022
MT0005083	HOMESTEAD PROPERTY UNAPPROVED	6/23/2021	0	Discovered	Sanitary survey 5/27/2021 New owner packet 7/12/2021
MT0005123	M&H SERVICES	2/16/2023	0	Discovered	Water hauler EQ#23-1785 SS 11/21/22 New owner packet sent 2/14/23
MT0005065	MIDWAY TOWNHOMES WUA	11/19/2020	2		Sanitary survey 11/18/2020
MT0005088	MOBILE CITY 3	9/16/2021	1	Discovered CC to 0000241	New owner packet 9/9/2021 Sanitary survey 11/1/2021
MT0005064	NCMRWA NORTH SHELBY	11/19/2020	5	Planned CC to 0000338	New owner packet 12/23/2020 Sanitary survey 9/21/2021
MT0005075	NINE MILE CO WATER/SEWER DISTRICT	5/13/2021	0	Planned CC to 0005064	New owner packet 5/4/2021 Sanitary survey 9/21/2021
MT0005034	RAVALLI ELECTRIC CO OP	2/13/2020	1	Planned EQ18-1747 4-log	New system packet 2/13/2020 Sanitary survey 7/10/2020 CL2 TA 7/10/2020
MT0005112	RIVER CREST WATER ASSOCIATION UNAPPROVED	11/16/2022	6		Activated 10/1/22 New system packet mailed. Scheduled for SS in 2023. FTM violations
MT0005122	SILVER RUN SCHOOL	2/16/2023	0		SS 1/10/23 New system packet mailed. GWDISW determination made. LC letter mailed.
MT0005118	STILL RIVER ESTATES SUBDIVISION	11/16/2022	10		New owner packet SS 1/13/23
MT0004605	STONE RIDGE WATER COMPANY	2/16/2021	0	Planned	New owners packet 2/11/2021 Sanitary survey 10/7/2021 SD TA
MT0005056	SUNDANCE SUBDIVISION	2/16/2023	0		
MT0005002	SWEETGRASS RANCH SUBDIVISION	2/13/2020	1	Planned EQ08-1434	New owner packet 2/13/2020 Sanitary survey 11/16/2020
MT0005069	THE BENCHES	9/20/2022	1		
MT0005077	THE FALLS MOBILE HOME COMMUNITY	6/23/2021	0	Discovered CC to 0000525	New owner packet 7/12/2021
MT0004989	THE NINES SUBDIVISION	8/18/2021	2	Planned EQ18-1064	New owner packet 8/2/2021
MT0005085	TWO SMOKES WAY LOT 5	9/16/2021	1	Planned EQ21-1959	New owner packet 9/21/2021 Sanitary survey 2/15/2022
MT0005063	UPS GLENDIVE	11/19/2020	1	Planned EQ22-1164	New owner packet 12/23/2020 Sanitary survey 9/23/2020

					RTCR LVL 2 4/25/2022
MT0005079	VAEROY ENTERPRISES, INC	6/23/2021	1	Planned EQ17-1562	New owner packet 7/12/2021 Sanitary survey 10/21/2021

Existing systems (Com, NTNC and TNC) list of PWSs (last three years) with an ETT score of 11 or greater for the 2023 Annual Capacity Development Report Montana.

PWSID	PWS Name	PWS Type	Highest ETT	TMF self -assessment or TMF assistance - provide narrative
MT0004255	2 BAR LAZY H CAMPGROUND	Transient Non-Community	17	FTM-N, RTCR ETT +5
MT0004802	AVALON SUBDIVISION	Community	12	FTM-RTCR, Pb/Cu, N, CCR ETT+4
MT0001274	BEAVER CREEK GOLF COURSE	Transient Non-Community	11	FTM-RTCR, N ETT unchanged
MT0004891	BEE HIVE HOMES MSLA	Community	20	CL2, DBP, N, VOC, Pb/Cu and CCR. Majority of violations occurred prior to the 2021 sanitary survey. Score should be significantly reduced if system stays on current path. ETT unchanged
MT0005012	BIGFORK MOTORCOACH RV RESORT	Transient Non-Community	11	Planned mainline replacement project. Addition of emergency CL2 port for seasonal disinfection prior to opening. CC to #0262. MTDEQ onsite TA visits.
MT0003750	BLAINE CREEK GRILL	Transient Non-Community	11	System closed since 3/2022. Inactivated by DEQ PWS on 9/3/22. Accumulated FTM violations occurred after closure.
MT0004697	BROADWATER ESTATES HOA	Community	26	FTM four quarters in 2021 for arsenic. CL2, N ETT unchanged
MT0003140	BUFFALO LODGE BAR	Transient Non-Community	11	System was inactivated on 6/11/2022 ETT unchanged
MT0004303	BUTTE VIGILANTE SADDLE CLUB	Transient Non-Community	13	System was inactivated on 3/6/2021 ETT unchanged
MT0000771	CENTERVILLE SCHOOL	Non-Transient Non-Community	20	Last SS 11/5/21. CL2 violations have all achieved compliance.
MT0001606	CLARKS CROSSING	Transient Non-Community	16	FTM RTCR, N System connected to the City of Livingston and was inactivated on 4/7/2023
MT0002063	COUNTRY CLUB OF VIDA	Transient Non-Community	15	6/2/22 outreach by RTCR manager concerning FTM bacti and N. One sample was taken on 6/6/22 and FTM violations afterwards. ETT unchanged
MT0002077	CRAIG BAR	Transient Non-Community	11	FTM/report-CL2, RTCR, N Referred to enforcement 8/22 ETT +4

MT0003986	CRYSTAL SPRINGS WATER SYSTEM	Community	41	Referred to enforcement in 10/2020. No violations since 2020. SS 8/10/22 ETT unchanged
MT0004690	DEVILS ELBOW REC SITE	Transient Non- Community	12	Seasonal system removed required treatment without approval. Bureau of Land Management closed system until treatment can be reinstalled. ETT -8
MT0005047	DIVINE MERCY ACADEMY UNAPPROVED	Non-Transient Non-Community	11	CC to City of Belgrade. Inactivated 3/25/2021. ETT unchanged
MT0003796	EAGLE MOUNT	Transient Non- Community	11	Failure to maintain minimum free residual (0.41 mg/L) CL2 after CT FTM-RTCR ETT Unchanged
MT0004791	EAGLE RV PARK	Transient Non- Community	11	Failure to maintain minimum free residual (0.9 mg/L) CL2 after CT FTM-RTCR, report CL2
MT0002017	ELKHORN HOTSPRINGS RESORT LLC	Transient Non- Community	14	SD resolved through TA visit and follow up assistance 5/17/22. FTM issues continue to be an issue. ETT unchanged
MT0004707	EMIGRANT OUTPOST	Transient Non- Community	16	FTM – RTCR, N Contacted multiple times to encourage monitoring. Continued FTM violations.
MT0004654	FERK AND JERK	Transient Non- Community	11	Last FTM violation was in 6/2020. ETT unchanged
MT0004957	FIN'S TAP HOUSE	Transient Non- Community	19	CL2 reporting, FTM RTCR SS 9/7/22
MT0002735	FIREHOLE GUEST RANCH	Transient Non- Community	14	FTM RTCR Due for SS in 2023 (Yoder) Rule manager outreach
MT0004736	FORT HARRISON MILITARY COMPLEX	Non-Transient Non-Community	15	DBP – returned to compliance SS 2/18/21
MT0001284	GATEWAY MARKET INC CASEYS CORNER 9	Transient Non- Community	14	4/4/23 New owners System Name Change New owner packet Last SS 9/22
MT0000597	GOLDEN ESTATES TRAILER COURT	Community	16	FTM, Chem, CCR, RTCR “C” PWS with one source well after second well was disconnected. Last SS 4/22
MT0004448	GRASS LAND ESTATES	Community	11	FTM-(1)RTCR and (1)N ETT unchanged
MT0000407	GREEN VALLEY CAMPGROUND	Transient Non- Community	20	FTM-RTCR, N, 2018 CL2 SS 9/14/2021 one FTM since inspection ETT +3
MT0003928	GRIZZLY BAR	Transient Non- Community	16	FTM RTCR Appears to have been operating seasonally during COVID and accumulated points when closed.
MT0002160	H BAR J SALOON AND CAFE	Transient Non- Community	11	FTM-RTCR, N, Reporting VL CL2 2020 SS with no improvement

				ETT unchanged
MT0003861	HAMILTON GOLF CLUB SNACK SHOP	Transient Non-Community	12	FTM, SSS checklist last SS 5/19
MT0001341	HAPPY HOUR BAR AND LAKEVIEW CONDOS	Transient Non-Community	11	RTCR-MCL (EC+) and (3)FTM ETT unchanged
MT0000239	HARLEM CITY OF	Community	11	Repeated TTHM (MCL), CCR, Pb/Cu, (1)RTCR FTM
MT0004457	HEADWATERS LIVESTOCK AUCTION LLC	Transient Non-Community	12	FTM RTCR, Signed up for monthly reminder notice, System currently for sale
MT0000241	HELENA WATER SYSTEM	Community	15	DBP, WL004 determined to be GU, Last SS 12/21
MT0001922	HILLTOP TERRACE SUBDIVISION	Community	14	FTM-RTCR and N, Failure to report CCR Multiple contacts to resolve CCR issues RTCR-LVL1 ETT +3
MT0004896	HOVING BUSINESS CENTER	Non-Transient Non-Community	12	Multitude of CL2 failure to report VLs One FTM RTCR when operator quit. No new VLs ETT -16
MT0000428	HYSHAM TOWN OF	Community	30	Multitude of WP issues, operator cert, turbidity, On-site TA, SRF MAP TA, ongoing issues. Last SS in 22 provided target list.
MT0000257	JORDAN TOWN OF	Community	11	FTM, CL2, RTCR, SWW Last SS 6/23
MT0004370	KID CORRAL DAY CARE	Non-Transient Non-Community	16	MCL N – AOC 1/1/2023
MT0002031	KINGSBURY COLONY	Community	12	2021 4-log reapproval (EQ12-1884) min CL2 req 0.26 mg/L, Pb/Cu, N VL ETT unchanged
MT0000956	KIRBY SALOON	Transient Non-Community	15	Many FTM-RTCR, CL2 VLs and a couple N Pages of VLs since 2018 ETT -1
MT0003672	KOUNTRY KARE INC	Non-Transient Non-Community	20	N MCL,GWR WL sample, FTM-Pb/Cu ETT unchanged
MT0002779	LEWIS AND CLARK CAMPGROUND	Transient Non-Community	20	SS due 2023, SSS check list, CL2
MT0000274	LIBBY CITY OF	Community	11	Turbidity, CL2, VOC Compliance achieved
MT0000609	LINCOLN LOG HOTEL (UNAPPROVED)	Transient Non-Community	17	Pages of FTM-RTCR, FTM-GWR WL No apparent effort to meet RTCR monitoring requirements. Unapproved system. SS 5/22 and RTCR FTM the following month. ETT unchanged
MT0002860	MAVERICK MOUNTAIN RESORT LLC	Transient Non-Community	14	FTM-RTCR, N, SWTR, TA 5/22. Plans submitted for development of new source. ETT +3
MT0000402	MCDONALD TRAILER CT	Community	14	FTM-RTCR, CCR,N, Pb/Cu ETT unchanged

MT0001646	MILFORD COLONY INC	Community	13	CL2 monitoring, FTM-RTCR, N, CCR ETT unchanged
MT0003164	NEW LIFE CHURCH	Transient Non-Community	30	FTM-RTCR, N-MCL, CL2 reporting and monitoring ETT unchanged
MT0000587	OILMONT COUNTY WATER DISTRICT	Community	12	CC from 5064, CL2, Pb/Cu, CCR ETT unchanged
MT0000145	PALISADES APARTMENTS	Community	11	LC VL, Due for 2023 SS
MT0004821	PINE BUTTE	Transient Non-Community	13	CL2 monitoring, FTM-N ETT -1
MT0001597	PINE CREEK LODGE	Transient Non-Community	12	FTM-GWR WL, FTM-RTCR, N ETT unchanged
MT0001673	POPS INN	Transient Non-Community	21	FTM-RTCR, MCL-N, monitoring CL2 ETT unchanged
MT0002025	QUICK STOP DRIVE IN	Transient Non-Community	12	RTCR FTM, SSS Last SS 3/22
MT0004873	RAINBOW ESTATES	Community	13	Numerous VL with achieved compliance at time of 7/23 SS
MT0003819	REYNOLDS MARKET MILES CITY	Transient Non-Community	12	RTCR FTM 4/23 SS Numerous TA outreach
MT0004269	SAGE BRUSH SAMS	Transient Non-Community	25	FTM-RTCR, N-monitoring ETT unchanged
MT0004494	SANDERS WATER SYSTEM	Transient Non-Community	18	FTM-N and RTCR, TA outreach 1/22 ETT -7
MT0001621	SLEEPING BUFFALO HOT SPRINGS INC	Transient Non-Community	11	FTM-N and RTCR ETT unchanged
MT0001925	SOUTH CHOUTEAU COUNTY WATER DIST	Community	14	LC VL SS 7/22 Numerous TA outreach by state and TA providers
MT0004419	SPRING TREE RIDGE	Community	11	CCR, FTM-N, GWR WL, Arsenic, Radium Comb SS 8/20/2021 ETT unchanged
MT0000018	ST LABRE INDIAN SCHOOL	Community	22	TTHM MCL referred to enforcement, Pb/Cu, CL2, CCR SS 8/24/2021 – VLs persist ETT +18
MT0004963	STILLWATER GETAWAY	Transient Non-Community	14	FTM-N, New owner 1/1/2022 New owner packet sent 7/14/2022 ETT unchanged
MT0003139	SUPER 8 MOTEL OF BELGRADE	Transient Non-Community	11	FTM-N and RTCR TA outreach 6/7/2022 for N ETT unchanged
MT0003935	SWAN VALLEY CAFE	Transient Non-Community	15	RTCR FTM SS 6/21
MT0000368	TAMARACK COURT	Community	11	CL2 monitoring VL, Pb/Cu, CCR SS 3/17-18/2022 ETT unchanged

MT0002042	TEMPLED HILLS BAPTIST CAMP	Transient Non-Community	14	FTM-N ETT unchanged
MT0004429	THE HENDRICKSON WATER SYSTEM	Transient Non-Community	13	FTM- RTRC, N, Outreach to owners 7/22, county sanitarian 8/22 ETT unchanged
MT0004197	THE JUMP	Transient Non-Community	14	FTM- RTRC, N, SS 10/15/2021, system reactivated 10/15/21. New owner packet 11/16/2021 ETT unchanged
MT0001731	TOWN AND COUNTRY LANES AND BAR	Transient Non-Community	12	CL2 monitoring, RTRC, GWR WL, FTM-N SS 7/23/2020 ETT unchanged
MT0001509	TOWN HAUL DINER	Transient Non-Community	13	RTRC FTM, SS 6/23
MT0003489	TOWN PUMP BUTTE 3	Transient Non-Community	12	Disconnected well and is now CC to 00170 Inactivated 3489 on 12/1/2021 ETT unchanged
MT0000832	TRAVELERS REST ROPERS LOUNGE	Transient Non-Community	12	FTM-RTRC, GWR WL, RTRC PN Due for SS in 2022 ETT unchanged
MT0001489	UNCLE JOES OASIS BAR AND GRILL	Transient Non-Community	12	FTM- N, CL2 monitoring VLs, RTRC Enforcement consent order 9/7/21. Multiple VLs after AOC (primarily FTM CL2) ETT +1
MT0000493	WATERHOLE SALOON REEDPOINT	Transient Non-Community	12	RTRC FTM, new owner 1/4/22, New owner packet, SS 2/23
MT0002171	WESTERN MOBILE VILLAGE DILLON	Community	12	Pb/Cu reporting, CCR, FTM-N and RTRC SS due 2023 ETT unchanged
MT0004692	WHITE SANDY CAMPGROUND	Transient Non-Community	11	RTRC FTM, SSS SS 8/22
MT0000360	WHITE SULPHUR SPRINGS CITY OF	Community	15	FTM-RTRC, HAA5, N, Arsenic, VOC Pb/Cu reporting SWTP running 2/22/2022. OK since. ETT unchanged
MT0000359	WHITEHALL TOWN OF	Community	11	Uranium Comb, gross alpha Consent order schedule plans (8/1/22), bids (10/1/22) and complete construction (6/1/2024) ETT unchanged
MT0000361	WIBAUX TOWN OF	Community	13	RTRC issues, Billings DEQ PWS office have kept in touch with TA assistance
MT0002970	WOOLZIES WILLOW CREEK CAFE	Transient Non-Community	13	FTM RTRC SS 4/2019 multiple outreach contacts with no improvements
MT0000022	WORDEN BALLANTINE YELLOWSTONE	Community	31	CCR, Pb/Cu reporting, N MCL (referred to enf), CL2, Pb/Cu SRF loan –drill four GW wells ETT unchanged