



REGION 8

DENVER, CO 80202

FILED

Nov 12, 2025

7:15 AM

**U.S. EPA REGION 8
HEARING CLERK**

November 4, 2025

Ref: 8ECA-W-S

SENT VIA EMAIL
DIGITAL DELIVERY RECEIPT REQUESTED

Culligan of Missoula
Mr. Perry Thomas, Owner
Culligan of Missoula Public Water System
info@mtculligan.com

Subj: Administrative Order issued to Culligan of Missoula regarding Culligan of Missoula
Public Water System, PWS ID #MT0004067, Docket No. SDWA-08-2026-0005

Dear Mr. Thomas:

Enclosed is an Administrative Order (Order) issued by the United States Environmental Protection Agency under the authority of section 1414(g) of the Safe Drinking Water Act, 42 U.S.C. § 300g-3(g). Among other things, the Order alleges that Culligan of Missoula (Respondent), as owner of the Culligan of Missoula Public Water System (System), has violated the Lead and Copper Rule Improvements (LCRI), specifically 40 C.F.R. § 141.84, 141.85, and 141.90 (Part 141). The EPA is issuing this Order because the State of Montana's (State) previous compliance assurance efforts have not been effective in returning the System to compliance with Part 141, and the State has not yet obtained primary enforcement responsibility for the LCRI.

The Order is effective upon the date received. Please review the Order and within 10 business days provide the EPA with any pertinent information Respondent believes the EPA may not have regarding your development or submittal of the required Lead Service Line Inventory. If the EPA does not hear from you, the EPA will assume this information is correct. Please note if Respondent chooses to submit a plan and schedule to address submitting the Lead Service Line Inventory, the final date should be no greater than six months from the effective date of this order, unless Respondent can provide documentation of extenuating circumstances. If Respondent complies with the Order, the EPA may close the Order without further action. Failure to comply with the Order may trigger immediate action by the EPA, including a complaint seeking administrative penalties.

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The complaint may lead to assessment of civil penalties of up to \$71,545 (as adjusted for inflation) per day of violation, a court injunction ordering compliance, or both. 42 U.S.C. § 300g-3; 40 C.F.R. part 19; 90 Fed. Reg. at 1375 (January 8, 2025).

The Small Business Regulatory Enforcement and Fairness Act (SBREFA) may apply to this situation. Enclosed is a small business information sheet, outlining compliance assistance resources available to small businesses and small entities, in case these are relevant. SBREFA does not eliminate the responsibility to comply with the Order or Part 141. Also enclosed are several templates and fact sheets to assist Respondent in addressing the outstanding violations.

If you have any questions or to request an informal conference with the EPA, please contact Christina Carballal via email at Carballal-Broome.Christina@epa.gov, or by phone at (800) 227-8917, extension 6046, or (303) 312-6046. Any questions from your attorney should be directed to Mia Bearley, Senior Assistant Regional Counsel, via email at Bearley.Mia@epa.gov or by phone at (800) 227-8917, extension 6554, or (303) 312-6554. We urge your prompt attention to this matter.

Sincerely,

Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division

ENCLOSURES

cc:

Greg Montgomery, MTDEQ Lead Reduction in School Drinking Water Rule Manager (gregory.montgomery@mt.gov)
Libby Henrikson, MTDEQ Technical/Operator Certification Section Supervisor (ehenrikson2@mt.gov)
Scott Patterson, MTDEQ Public Water Supply Bureau Compliance Officer (spatterson@mt.gov)
Collin Zollinger, MT Department of Commerce Community Assistance Supervisor (LSLTA@mt.gov)
EPA Regional Hearing Clerk (r8_hearing_clerk@epa.gov)
Missoula Commissioners (bcc@missoulacounty.us)