



REGION 8

DENVER, CO 80202

FILED

Nov 12, 2025

9:52 AM

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

November 6, 2025

Ref: 8ECA-W-S

SENT VIA EMAIL
DIGITAL DELIVERY RECEIPT REQUESTED

Genesis Business Park Owners Association
c/o Mr. Justin Smith, Owner
Genesis Business Park Public Water System
justin@sterlingcmg.com

Subj: Administrative Order issued to Genesis Business Park Owners Association /
regarding Genesis Business Park Public Water System, PWS ID #MT0004178,
Docket No. SDWA-08-2026-0014

Dear Mr. Smith:

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 Genesis Business Park Owners Association (Respondent), as owner of the Genesis Business Park 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 the Respondent believes the EPA may not have regarding the development or submittal of the required Lead Service Line Inventory. If the EPA does not hear from the Respondent, 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. The complaint may lead to assessment of civil penalties of up to

Subj: Administrative Order issued to Genesis Business Park Owners Association / regarding Genesis Business Park Public Water System, PWS ID #MT0004178

\$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).

If the Respondent has any questions or to request an informal conference with the EPA, please contact Jessica Moore via email at Moore.Jessica@epa.gov, or by phone at (800) 227-8917, extension 6441, or (303) 312-6441. 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 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)
Gallatin Commissioners (jennifer.boyer@gallatin.mt.gov;
scott.macfarlane@gallatin.mt.gov; zach.brown@gallatin.mt.gov)
Doug Chandler, Director (accounting@genesisbusinesspark.org)