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Nov 12, 2025

11:32 AM

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

October 21, 2025

Ref: 8ECA-W-S

SENT VIA CERTIFIED MAIL
DELIVERY RECEIPT REQUESTED

Ethridge County Water District
c/o Mr. Eric Torgerson, Director
Ethridge County Water District Public Water System
PO Box 278
Ethridge, MT 59435

Subj: Administrative Order issued to Ethridge County Water District regarding Ethridge County Water District Public Water System, PWS ID #MT0004353,
Docket No. SDWA-08-2026-0021

Dear Mr. Torgerson:

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 Ethridge County Water District (Respondent), as owner of the Ethridge County Water District 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

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administrative penalties. 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 the Respondent in addressing the outstanding violations.

If you on behalf of the Respondent have any questions or to request an informal conference with the EPA, please contact Rachel Brookins via email at Brookins.Rachel@epa.gov, or by phone at (800) 227-8917, extension 6509, or (303) 312-6509. 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

Digitally signed by SUZANNE
BOHAN
Date: 2025.10.21 11:55:48 -06'00'

Suzanne J. Bohan, Director
Enforcement and Compliance Assurance Division

ENCLOSURES (7)

1. Montana LSL Inventory Template for Community Systems
2. Montana LSL Inventory Determination Guidance
3. Federal LSL Inventory Factsheet for Water Systems
4. Public Notification of Known or Potential LSL Template
5. Public Notice Tier 2 Failure to Develop LSL Inventory Template
6. Public Notice Tier 3 Failure to Certify LSL Inventory Template
7. Small Business Information Sheet January 2022

cc: Greg Montgomery, MTDEQ Lead Reduction in School Drinking Water Rule
Manager (gregory.montgomery@mt.gov)
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