UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

IN THE MATTER OF:	)	
	)	Docket No. SDWA-08-2026-0024
Wolfe Water Management,	)	
	)	**ADMINISTRATIVE ORDER**
Respondent.	)	
	)	
Holmberg Village Estates Public Water System	)	
PWS ID #MT0004190	)	

FILED
Nov 17, 2025
4:23 pm
U.S. EPA REGION 8
HEARING CLERK

1. This Order is issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by section 1414(g) of the Safe Drinking Water Act (Act), 42 U.S.C. § 300g-3(g), as properly delegated to the undersigned official.
2. Wolfe Water Management (Respondent) is a Montana corporation that owns the Holmberg Village Estates Public Water System (System). This System provides piped water to the public in Lewis and Clark County, Montana, for human consumption.
3. The System is supplied by a groundwater source accessed via two wells.
4. The System has approximately 112 service connections used by year-round residents and regularly serves an average of approximately 225 year-round residents. Therefore, the System is a "public water system" and a "community water system" as defined in 40 C.F.R. § 141.2 and sections 1401(4) and (15) of the Act, 42 U.S.C. §§ 300f(4) and (15).
5. Respondent is a "person" as defined in section 1401(12) of the Act, 42 U.S.C. § 300f(12) and is subject to the Act and 40 C.F.R. part 141 (Part 141). Part 141 is an "applicable requirement" as defined in section 1414(i) of the Act, 42 U.S.C. § 300g-3(i). Respondent is a "supplier of water" within the meaning of section 1401(5) of the Act, 42 U.S.C. § 300f(5), and 40 C.F.R. § 141.2.
6. EPA promulgated the original Lead and Copper Rule (LCR), 40 C.F.R. § 141.80 *et seq.*, in 1991.
7. On January 15, 2021, EPA promulgated the Lead and Copper Rule Revisions (LCRR). On December 6, 2023, EPA published the proposed Lead and Copper Rule Improvements (LCRI). On October 30, 2024, EPA promulgated the final LCRI. 89

Fed. Reg. 86418 (October 30, 2024).

8. The LCRI modified most of the requirements in the LCRR and established a compliance date of November 1, 2027, for those provisions. The LCRI also incorporated select provisions from the 2021 LCRR, including the October 16, 2024, compliance deadline for initial service line inventories.

9. When a state does not have primary enforcement responsibility for public water systems, EPA is authorized to take enforcement action under section 1414(a)(2) of the Act, 42 U.S.C. § 300g-3(a)(2).

10. The Montana Department of Environmental Quality (MDEQ) administers the Public Water Supply Supervision Program in Montana pursuant to section 1413 of the Act, of the Act, 42 U.S.C. § 300g-2. MDEQ has not yet obtained primary enforcement responsibility for the LCRI, therefore, EPA has primary responsibility for enforcement of the LCRI for the State of Montana (State).

VIOLATIONS

11. As required by 40 C.F.R. § 141.84(a), a water system must develop a service line inventory that identifies the materials of all service lines connected to the public water distribution system. Systems were required to develop and submit an initial service line inventory by October 16, 2024, pursuant to the reporting requirements of 40 C.F.R. §§ 141.84(a)(1) and 141.90(e)(1). Respondent failed to develop and submit the System's required initial service line inventory to the State by the October 16, 2024, deadline.

12. Failure to develop an initial inventory by October 16, 2024, requires Tier 2 Public Notification (PN) within 30 calendar days, with the public notice to be repeated every three months and for notice to remain in place for as long as the violation or situation persists, pursuant to 40 C.F.R. Subpart Q of Part 141 (Subpart Q), Appendix A. Within 10 calendar days after providing public notice, a copy of the PN and a certification of completion must be provided to the State. Respondent failed to provide Tier 2 PN and certify its completion to the State as required by Subpart Q to the persons served by the System.

13. Failure to submit initial inventory to the State by October 16, 2024, requires Tier 3

PN within one year pursuant to Subpart Q, Appendix A. Within 10 calendar days after providing public notice, a copy of the PN and a certification of completion must be provided to the State. Respondent failed to provide a Tier 3 PN and certify its completion to the State as required by Subpart Q to the persons served by the System.

14. Within 30 days of completing its initial service line inventory, a water system must provide certain notification to all persons served by the water system from service connections with a lead, galvanized iron or steel requiring replacement, or lead status unknown service line. 40 C.F.R. §141.85(e)(1) and (e)(2). The System shall use the notification sent by mail or by another method approved by EPA to provide such persons with notice of a service line that is known to or may potentially contain lead. 40 C.F.R. §141.85(e)(1) and (e)(4). Further, the notice shall include public education materials that provide the explanations and content as required by 40 CFR 141.85(e)(3). Respondent has failed to provide notification to all persons served by the System from such service connections that the service line is known to contain, or has the potential of containing, lead; or such notification has failed to meet the timing, content, or delivery requirements as prescribed in 40 C.F.R. § 141.85(e).

15. A water system must make the initial service line inventory publicly available pursuant to 40 C.F.R. §141.84(a)(8). Respondent failed to make the initial service line inventory publicly available as prescribed in 40 C.F.R. §141.84(a)(8).

16. EPA is issuing this Order to address the violations enumerated above and to place Respondent on an enforceable schedule to comply with the LCRI.

ORDER

Respondent is ordered to perform the following actions upon Respondent's receipt of this Order (unless a different deadline is specified below):

17. Respondent is ordered to comply with all provisions of the Act and Part 141, including but not limited to each requirement cited above.

18. For any future violation of this Order that does not specify a reporting period, Respondent must report the violation to EPA within 48 hours of the violation

occurring, as required by 40 C.F.R. § 141.31(b).

19. Within 30 days after the effective date of this Order, Respondent shall develop and submit its initial service line inventory or provide a proposed plan and schedule to develop and submit its initial lead service line inventory, as required by 40 C.F.R. § 141.84(a), to EPA. Respondent shall submit its inventory to the addresses specified in paragraph 26.

20. Within 30 days after the effective date of this Order and quarterly thereafter until the violation is resolved, Respondent shall issue Tier 2 PN for its failure to develop and submit its initial service line inventory, as required by 40 C.F.R. § 141.203. Within 10 calendar days after providing public notice, Respondent shall provide a copy of the PN and certification to the addresses specified in paragraph 26.

21. Within 30 days after the effective date of this Order, Respondent shall issue Tier 3 PN for its failure to develop and submit its initial service line inventory, as required by 40 C.F.R. § 141.204. Within 10 calendar days after providing public notice, Respondent shall provide a copy of the PN and certification to the addresses specified in paragraph 26.

22. Within 30 days of submitting the initial lead service line inventory, Respondent shall notify and provide required public education materials to all customers served by a lead service line, galvanized pipe(s) requiring replacement, or lead status unknown service line, as required by 40 C.F.R. § 141.85. Respondent shall provide information that this was accomplished to the addresses specified in paragraph 26.

23. Within 30 days of submitting the initial lead service line inventory Respondent shall make its initial service line inventory publicly available, as required by 40 C.F.R. § 141.84(a)(8). Respondent shall provide information that this was accomplished by submitting appropriate documentation to the addresses specified in paragraph 26.

24. If the population or number of connections served by the System falls below 25 individuals or 15 connections, Respondent must notify the State and EPA in writing within 10 calendar days.

25. If Respondent (a) leases, sells, or otherwise transfers the System to another person

or entity, or (b) contracts with or hires any other person or entity to operate the System, Respondent must, within 10 calendar days after such transfer or contract, provide a copy of this Order to the lessee, purchaser, or contractor and notify the State and EPA in writing of the change. In either of these circumstances, Respondent will remain obligated to comply with this Order.

26. Respondent must send all reporting and notifications required by this Order to EPA at:

Email: moore.jessica@epa.gov and gregory.montgomery@mt.gov

GENERAL PROVISIONS

27. This Order is binding on Respondent, Respondent's successors and assigns, and any person (*e.g.*, employee, contractor, or other agent) acting in concert with Respondent.

28. This Order does not constitute a waiver, suspension, or modification of any requirement of the Act or Part 141. Issuance of this Order is not an election by EPA to forgo any civil or criminal action.

29. Violation of any part of this Order, the Act, or Part 141 may subject Respondent to a civil penalty 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 1377 (January 8, 2025).

30. Respondent may seek federal judicial review of this Order pursuant to section 1448(a) of the Act, 42 U.S.C. § 300j-7(a).

Issued: November 14, 2025.

COLLEEN RATHBONE Digitally signed by COLLEEN RATHBONE
Date: 2025.11.14 11:24:46 -07'00'

Colleen Rathbone, Manager
Water Enforcement Branch
Enforcement and Compliance Assurance Division