



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

2014 JUL 24 PM 12:19

EPA REGION VIII
HEARING CLERK

JUL 15 2014

Ref: 8ENF-L

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Terry L. Burkholder, Owner
Bitterroot Gateway MH and RV Park
P.O. Box 1292
Lolo, Montana 59847

Paul Neal Cooley, Registered Agent
Bitterroot Gateway MH and RV Park, L.L.C.
5707 West Harrier Avenue
Missoula, Montana 59801

Re: In the Matter of Bitterroot Gateway MH and RV Park, L.L.C, Complaint and Notice of Opportunity for Hearing, Docket No. **SDWA-08-2014-0023**

Dear Mr. Burkholder and Mr. Cooley:

Enclosed is an administrative Complaint and Notice of Opportunity for Hearing (Complaint) filed against Bitterroot Gateway MH and RV Park, L.L.C. (Bitterroot Gateway), under section 1414 of the Safe Drinking Water Act (SDWA), 42 U.S.C. § 300g-3. The U.S. Environmental Protection Agency (EPA) alleges in the Complaint that Bitterroot Gateway failed to comply with an Administrative Order issued on January 27, 2010, under section 1414(g) of the SDWA, 42 U.S.C. § 300g-3(g), for alleged violations of the SDWA and the National Primary Drinking Water Regulations (NPDWRs) at the Bitterroot Gateway MH and RV Park Public Water System (System). The violations are specifically set out in the Complaint.

By law, Bitterroot Gateway has the right to request a hearing regarding the matters set forth in the Complaint. Please pay particular attention to those sections of the Complaint entitled "Opportunity to Request a Hearing" and "Failure to File an Answer." If Bitterroot Gateway does not respond to this Complaint within 30 days of receipt, a default judgment may be entered and the proposed civil penalty may be assessed without further proceedings. Bitterroot Gateway may request a hearing in its answer. Bitterroot Gateway has the right to be represented by an attorney at any stage of these proceedings.

Whether or not Bitterroot Gateway requests a hearing, a designated representative may confer informally with the EPA concerning the alleged violations or the amount of the proposed penalty.

The EPA encourages all parties against whom it files a complaint proposing the assessment of a penalty to pursue the possibilities of settlement through an informal conference. Any such settlement shall be

finalized by the issuance of a final order by the Regional Judicial Officer, EPA Region 8. The issuance of a final order incorporating a consent agreement shall constitute a waiver of Bitterroot Gateway's right to request a hearing on any matter to which it stipulated in that agreement.

A request for an informal conference does not extend the 30-day period during which Bitterroot Gateway must submit a written answer and a request for a hearing. The informal conference procedure may be pursued as an alternative to, and simultaneously with, the adjudicatory hearing. Please note that if Bitterroot Gateway does not file an answer, it may be subject to a default order requiring payment of the full penalty proposed in the complaint, even if Bitterroot Gateway requested an informal conference.

For any questions specific to the violations or penalty, the most knowledgeable person on my staff regarding this matter is Sienna Meredith who can be reached at (800) 457-2690, extension 5026, or (406) 457-5026. If you are represented by an attorney or have legal questions, please contact Amy Swanson, Enforcement Attorney, at (800) 227-8917, extension 6906, or at (303) 312-6906.

We urge your prompt attention to this matter.

Sincerely,



Eddie A. Sierra
Acting Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosures

1. Administrative Complaint and Notice of Opportunity for Hearing
2. Consolidated Rules of Practice (Complainant's Exhibit 1)
3. Sanitary Survey, dated September 24, 2013 (Complainant's Exhibit 2)
4. Administrative Order (Complainant's Exhibit 3)
5. Violation of Administrative Order letter (Complainant's Exhibit 4)
6. 2nd Violation of Administrative Order letter (Complainant's Exhibit 5)
7. Notice of Violation to the State (Complainant's Exhibit 6)
8. MDEQ Annual Monitoring Schedule and Letter, dated February 4, 2011 (Complainant's Exhibit 7)

cc: Tina Artemis, Regional Hearing Clerk
Chad Anderson, MDEQ
Jon Dilliard, MDEQ

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2014 JUL 24 PM 12:19

IN THE MATTER OF:)
)
)
Bitterroot Gateway MH and RV Park, LLC)
Missoula County, Montana)
PWS ID #MT0000443,)
)
)
Respondent.)

Docket No. SDWA-08-2014-0023

EPA REGION VIII
HEARING CLERK

**COMPLAINT AND NOTICE OF
OPPORTUNITY FOR HEARING**

In this Complaint and Notice of Opportunity for Hearing (Complaint), the United States Environmental Protection Agency (EPA) proposes to assess a civil administrative penalty against Bitterroot Gateway MH and RV Park, LLC (Respondent).

JURISDICTIONAL ALLEGATIONS

This Complaint is issued under the authority vested in the Administrator of the EPA by section 1414(g)(3)(B) of the Safe Drinking Water Act (the SDWA), 42 U.S.C.

§ 300g-3(g)(3)(B). The undersigned EPA official has been duly authorized to institute this action.

This proceeding is subject to the EPA's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination, or Suspension of Permits, 40 C.F.R. part 22, a copy of which is attached as Complainant's Exhibit 1.

GENERAL ALLEGATIONS

The following general allegations apply to each count of this Complaint:

1. The Respondent is a Montana limited liability corporation and, therefore, a "person" as defined in section 1401(12) of the SDWA, 42 U.S.C. § 300f(12), and 40 C.F.R. § 141.2.

2. The Respondent owns and/or operates a system, the Bitterroot Gateway Mobile Home public water system (the System), located in Missoula County, Montana, for the provision of water for human consumption to the public through pipes or constructed conveyances.

3. The source of the System's water is ground water from two wells. The System at the time the Order was issued served approximately 53 year-round residents through 29 service connections and an additional 67 persons daily at least 60 days out of the year through 23 service connections. According to an updated Sanitary Survey dated September 24, 2013, the System currently serves 96 persons. A copy is attached as Complainant's Exhibit 2.

4. Because the System has at least 15 service connections used by year-round residents and/or regularly serves at least 25 year-round residents, the System is a "public water system" and a "community water system" as those terms are defined in 40 C.F.R. § 141.2 and section 1401 of the SDWA, 42 U.S.C. § 300f.

5. As an owner and/or operator of a public water system, the Respondent is a "supplier of water" as defined in section 1401(5) of the SDWA, 42 U.S.C. § 300f(5), and 40 C.F.R. § 141.2. The Respondent, therefore, is subject to 40 C.F.R. part 141 (also known as the National Primary Drinking Water Regulations or NPDWRs), each of which is an "applicable requirement" as defined in section 1414(i) of the SDWA, 42 U.S.C. § 300g-3(i).

6. On January 27, 2010, in accordance with section 1414(g)(1) of the SDWA, 42 U.S.C. § 300g-3(g)(1), the EPA issued the Respondent an Administrative Order (Order), Docket No. SDWA-08-2010-0007, citing violations of the NPDWRs. A copy is attached as Complainant's Exhibit 3.

7. The Order requires that the Respondent achieve compliance with the NPDWR violations

alleged including, but not limited to, 1) monitoring the System's water quarterly for combined radium until a different monitoring frequency is specified by the State; 2) monitoring the System's water for gross alpha at each entry point every 9 years; 3) monitoring the System's water annually for nitrate; 4) monitoring the System's water for inorganic contaminants; and 5) monitoring the System's water for volatile organic contaminants. Additionally, the Order requires the Respondent to submit analytical results to the EPA and State within the first 10 days following the month in which each sample result is received; notify the public of NPDWR violations; and report any violations of the NPDWRs to the EPA and the State within 48 hours.

8. By letter dated September 13, 2010, the EPA notified the Respondent that it was in violation of the Order. A copy is attached as Complainant's Exhibit 4. Specifically, the EPA cited the following violations: 1) failure to monitor for combined radium at each entry point to the distribution system as required by 40 C.F.R. 141.26(a) between April 1 and June 30, 2010; and 2) failure to report the above referenced violation to the EPA and the State within 48 hours of discovery.

9. By letter dated March 12, 2014, the EPA notified the Respondent a second time that it was in violation of the Order. A copy is attached as Complainant's Exhibit 5. Specifically, the EPA cited the Respondent for failing to monitor for VOCs during the 2011-2013 monitoring period.

10. The Montana Department of Environmental Quality (MDEQ) has primary enforcement authority for the Act in the State of Montana (State). On December 10, 2009, the EPA issued MDEQ a Notice of Violation pursuant to section 1414(a) of the Act, 42 U.S.C. § 300g-3(a), regarding the violations at the System. A copy is attached as Complainant's Exhibit 6. The

MDEQ elected not to commence an appropriate enforcement action against the System for the violations within the thirty day time frame set forth in section 1414(a) of the Act, 42 U.S.C. § 300g-3(a).

11. The EPA provided the State, through MDEQ, with a copy of and an opportunity to confer regarding this Order pursuant to section 1414(g)(2) of the SDWA, 42 U.S.C. § 300g-3(g)(2).

VIOLATIONS

Count I

Failure to Report Combined Radium results

12. According to 40 C.F.R. § 141.26, community water systems are required to monitor their water at every entry point to the distribution system for combined radium for four consecutive quarters to comply with the initial monitoring requirements, and quarterly thereafter unless a different monitoring frequency is specified by the state.

13. Paragraph 22 of the Order requires the Respondent to report analytical results to EPA and the State within the first 10 days following the month in which each sample result is received.

14. The Respondent failed to report to EPA the combined radium samples collected on June 14, 2010, until October 7, 2010.

15. The Respondent failed to timely report combined radium for both wells at both entry points to the distribution system for the 2nd quarter (April-June) of 2010 in violation of the Order and 40 C.F.R. § 141.31(a).

Count II
Failure to Monitor for VOCs

16. According to 40 C.F.R. § 141.24(f)(5), ground and surface water systems that completed the initial monitoring by December 31, 1992, and did not detect any contaminant listed in 40 C.F.R. § 141.61(a)(1) through (21), are required to monitor their water at least annually for VOCs.

17. The State may allow groundwater systems with no previous detection of any contaminant listed in 40 C.F.R. § 141.61(a) to take one sample during each compliance period following a minimum of three years of annual sampling,

18. On February 4, 2011, the State notified the Respondent in writing that the System was placed on a reduced monitoring schedule whereby they had to monitor for VOCs every three years, and the next sampling period would be during the 2011 – 2013 compliance period. A copy is attached as Complainant's Exhibit 7.

19. Paragraph 19 of the Order requires the Respondent to monitor the System's water for VOCs as required by 40 C.F.R. § 141.24.

20. The Respondent failed to monitor the System's water for VOC contaminants during the 2011-2013 monitoring period in violation of the Order and 40 C.F.R. § 141.24.

Count III
Failure to Report NPDWR Violation

21. According to 40 C.F.R. § 141.31(b), the supplier of water is required to report to the state within 48 hours of failure to comply with any NPDWR.

22. Paragraph 21 of the Order requires the Respondent to report any violation of the NPDWRs to the EPA and the State within 48 hours of discovery.

23. The Respondent failed to report to the EPA and State the violations detailed in Counts I and II above in violation of the Order and 40 C.F.R. § 141.31(b).

PROPOSED PENALTY

This Complaint proposes that the EPA assess an administrative penalty against the Respondent. The EPA is authorized to assess an administrative penalty according to section 1414(g)(3)(B) of the SDWA, 42 U.S.C. § 300g-3(g)(3)(B), for violation of an administrative order issued under section 1414(g) of the SDWA. The amount of the administrative penalty may not exceed \$32,500 for violations occurring after January 12, 2009 (the original statutory amount of \$25,000 has been adjusted for inflation pursuant to 40 C.F.R. part 19. See 74 Fed. Reg. 626, January 7, 2009.)

The EPA has determined the proposed penalty amount in accordance with section 1414 of the SDWA, 42 U.S.C. § 300g-3. Taking into account the seriousness of the violations, the population at risk, and other appropriate factors, including the Respondents' degree of willfulness and/or negligence, history of noncompliance, and ability to pay, as known to the EPA at this time, the EPA proposes to assess an administrative civil penalty of **\$1,100** against the Respondent for its violations of the Order.

OPPORTUNITY TO REQUEST A HEARING

As provided in section 1414(g)(3)(B), 42 U.S.C. § 300g-3(g)(3)(B), the Respondent has the right to request a public hearing to contest any material fact alleged in this Complaint, to contest the appropriateness of the proposed penalty, and/or to assert that it is entitled to judgment as a matter of law.

If the Respondent wishes to request a hearing, the Respondent must file a written answer in accordance with 40 C.F.R. § 22.15 within thirty (30) calendar days after this Complaint is served. If this Complaint is served by mail, the Respondent has an additional five (5) calendar days, pursuant to 40 C.F.R. § 22.7(c), in which to file its answer.

If the Respondent requests a hearing in its answer, the procedures provided in 40 C.F.R. part 22, subpart I, will apply to the proceedings and the Regional Judicial Officer will preside. However, the Respondent has the right under the SDWA to elect a hearing on the record in accordance with section 554 of the Administrative Procedure Act, 5 U.S.C. § 551 et seq. For the Respondent to exercise this right, the answer must include a specific request for a hearing on the record in accordance with 5 U.S.C. § 554. Upon such request, the Regional Hearing Clerk will place new captions on the pleadings and documents in the record as necessary. (See 40 C.F.R. § 22.42.) Pursuant to such a request, subpart I will not apply to the proceedings and an administrative law judge from Washington, D.C. will preside.

The answer must be in writing. An original and one copy of the answer must be sent to:

Tina Artemis, Regional Hearing Clerk
U.S. EPA Region 8 (8RC)
1595 Wynkoop Street
Denver, Colorado 80202-1129

A copy of the answer must also be sent to:

Amy Swanson, Enforcement Attorney
U.S. EPA Region 8 (8ENF-L)
1595 Wynkoop Street
Denver, CO 80202-1129

FAILURE TO FILE AN ANSWER

If the Respondent does not file a written answer with the Regional Hearing Clerk at the address above within thirty (30) days of receipt of this Complaint, the Respondent may be subject to a default order requiring payment of the full penalty proposed in this Complaint.

The EPA may obtain a default order according to 40 C.F.R. § 22.17.

REQUIREMENTS FOR ANSWER

The answer must clearly and directly admit, deny, or explain each of the factual allegations contained in this Complaint with regard to which the Respondent has any knowledge. The answer must state (1) any circumstances or arguments the Respondent alleges to constitute grounds of defense, (2) any facts the Respondent disputes, (3) whether and on what basis the Respondent opposes the proposed penalty, and (4) whether the Respondent requests a hearing.

Failure to admit, deny, or explain any material factual allegation contained in this Complaint shall constitute an admission of that allegation.

QUICK RESOLUTION

The Respondent may resolve this action by paying the proposed penalty in full pursuant to 40 C.F.R. § 22.18. If such payment is made within thirty (30) calendar days of receipt of this Complaint, the Respondent need not file an answer. Alternatively, as allowed by 40 C.F.R. § 22.18(b), the Respondent may file a statement with the Regional Hearing Clerk within thirty (30) days of receipt of this Complaint agreeing to pay the full assessed penalty and may make the penalty payment within sixty (60) days of receiving this Complaint.

The payment shall be made by remitting a check or making a wire transfer or on-line payment in the amount of \$1,100. The check or other payment shall designate the name and docket number of this case and be payable to "Treasurer, United States of America."

If remitted by regular U.S. mail:

U.S. Environmental Protection Agency / Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

If remitted by any overnight commercial carrier:

U.S. Bank
1005 Convention Plaza
Mail Station SL-MO-C2GL
St. Louis, Missouri 63101

If remitted by wire transfer: Any wire transfer must be sent directly to the Federal Reserve Bank in New York City using the following information:

Federal Reserve Bank of New York
ABA = 021030004
Account = 68010727
SWIFT address = FRNYUS33
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read "D 68010727
Environmental Protection Agency"

If remitted through the Automated Clearing House (ACH) for receiving US currency:

U.S. Treasury REX / Cashlink ACH Receiver
ABA: 051036706
Account Number: 310006, Environmental Protection Agency
CTX Format Transaction Code 22 -- checking
Physical location of U.S. Treasury facility:
5700 Rivertech Court
Riverdale, Maryland 20737

Contacts: John Schmid (202-874-7026) and REX (Remittance Express)
800-234-5681

If remitted on-line with a debit card or credit card: No user name, password, or account number is necessary for this option. On-line payment can be accessed via WWW.PAY.GOV, entering 1.1 in the form search box on the left side of the screen, opening the form, and following the directions on the screen.

At the time of payment, a copy of the check (or notification of other type of payment) shall also be sent to:

Sienna Meredith, Enforcement Officer
U.S. EPA Region 8, Montana Office (8MO)
Federal Building, 10 W. 15th Street, Suite 3200
Helena, Montana 59626

and

Tina Artemis, Regional Hearing Clerk (8RC)
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129

Payment of the penalty in this manner does not relieve the Respondent of the obligation to comply with the requirements of the SDWA and its implementing regulations. Payment of the penalty in this manner does, however, constitute consent by the Respondent to the assessment of the proposed penalty and a waiver of the Respondent's right to a hearing on this matter.

SETTLEMENT CONFERENCE

The EPA encourages exploring settlement possibilities through informal settlement negotiations. **However, failing to file an answer may lead to a default order, even if settlement negotiations occur.** The parties may simultaneously pursue settlement and proceed with administrative litigation. If a settlement is reached, its terms shall be expressed in a written consent agreement to be signed by the parties and incorporated into a final order signed by the

Regional Judicial Officer. Any request for settlement negotiations should be directed to the attorney for the EPA, who can be reached by telephone at (303) 312-6906 or email at swanson.amy@epa.gov.

Dated this 15 day of July, 2014.

**UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY, REGION 8**
Complainant



Eddie A. Sierra
Acting Assistant Regional Administrator
Office of Enforcement, Compliance and
Environmental Justice

1st page only

§ 21.13

40 CFR Ch. I (7-1-08 Edition)

approve or disapprove the State issued statement, in accordance with the requirements of § 21.5.

(2) The Regional Administrator will periodically review State program performance. In the event of State program deficiencies the Regional Administrator will notify the State of such deficiencies.

(3) During that period that any State's program is classified as deficient, statements issued by a State shall also be sent to the Regional Administrator for review. The Regional Administrator shall notify the State, the applicant, and the SBA of any determination subsequently made, in accordance with § 21.5, on any such statement.

(i) If within 60 days after notice of such deficiencies has been provided, the State has not taken corrective efforts, and if the deficiencies significantly affect the conduct of the program, the Regional Administrator, after sufficient notice has been provided to the Regional Director of SBA, shall withdraw the approval of the State program.

(ii) Any State whose program is withdrawn and whose deficiencies have been corrected may later reapply as provided in § 21.12(a).

(g) Funds appropriated under section 106 of the Act may be utilized by a State agency authorized to receive such funds in conducting this program.

§ 21.13 Effect of certification upon authority to enforce applicable standards.

The certification by EPA or a State for SBA Loan purposes in no way constitutes a determination by EPA or the State that the facilities certified (a) will be constructed within the time specified by an applicable standard or (b) will be constructed and installed in accordance with the plans and specifications submitted in the application, will be operated and maintained properly, or will be applied to process wastes which are the same as described in the application. The certification in no way constitutes a waiver by EPA or a State of its authority to take appropriate enforcement action against the owner or operator of such facilities for violations of an applicable standard.

PART 22—CONSOLIDATED RULES OF PRACTICE GOVERNING THE ADMINISTRATIVE ASSESSMENT OF CIVIL PENALTIES AND THE REVOCATION/TERMINATION OR SUSPENSION OF PERMITS

Subpart A—General

- Sec. 22.1 Scope of this part. 22.2 Use of number and gender. 22.3 Definitions. 22.4 Powers and duties of the Environmental Appeals Board, Regional Judicial Officer and Presiding Officer; disqualification, withdrawal, and reassignment. 22.5 Filing, service, and form of all filed documents; business confidentiality claims. 22.6 Filing and service of rulings, orders and decisions. 22.7 Computation and extension of time. 22.8 Ex parte discussion of proceeding. 22.9 Examination of documents filed.

Subpart B—Parties and Appearances

- 22.10 Appearances. 22.11 Intervention and non-party briefs. 22.12 Consolidation and severance.

Subpart C—Prehearing Procedures

- 22.13 Commencement of a proceeding. 22.14 Complaint. 22.15 Answer to the complaint. 22.16 Motions. 22.17 Default. 22.18 Quick resolution; settlement; alternative dispute resolution. 22.19 Prehearing information exchange; prehearing conference; other discovery. 22.20 Accelerated decision; decision to dismiss.

Subpart D—Hearing Procedures

- 22.21 Assignment of Presiding Officer; scheduling the hearing. 22.22 Evidence. 22.23 Objections and offers of proof. 22.24 Burden of presentation; burden of persuasion; preponderance of the evidence standard. 22.25 Filing the transcript. 22.26 Proposed findings, conclusions, and order.

Subpart E—Initial Decision and Motion to Reopen a Hearing

- 22.27 Initial decision. 22.28 Motion to reopen a hearing.

RECEIVED

JUL 28 2014

Kalispell file



Montana Department of
ENVIRONMENTAL QUALITY

MT DEPT OF PUBLIC WATER
DIVISIONS BUREAU

Steve Bullock, Governor

655 Timberwolf Parkway • Suite 100 • Kalispell, MT 59901-1215 • (406) 755-8985 • FAX (406) 755-8977

10/7/2013

Bitterroot Gateway Mobile Home Park Lolo
Attn.: Terry Burkholder
P.O. Box 1292
Lolo, MT 59847

Re: Sanitary Survey Inspection of Bitterroot Gateway Mobile Home Park
(PWSID: MT0000443).

Dear Mr. Burkholder,

I would like to thank your son, Bo, for opening both pump houses before he left for work so I could complete the sanitary survey inspection of Bitterroot Gateway Mobile Home Park. As a transient water supply system, your facility is required to have a sanitary survey inspection every three years. These regular inspections offer us an opportunity to look for sanitary deficiencies that have the potential to cause contamination in the water system, as well as pointing out operation and maintenance concerns. Below are a few comments relating to the sanitary survey conducted on 9/24/2013.

SOURCE(s):

Well 1 (WL002) construction information can be reviewed in GWIC log 67505 (attached). WL002 is located in the southwest corner of the mobile home park and serves several customers in that area prior to entering the central pump house (PC001).

- I recommend the valve vault located immediately next to WL002 be removed and the hole backfilled. This valve vault is a safety concern, potential liability and could serve as a conduit for contaminants to affect the well source.
- WL002 does not have a raw water sampling tap prior to the first service.

Well 2 (WL003) construction information can be reviewed in GWIC log 67508 (attached). WL003 is located in the northeast corner of the RV park and serves all customers in that area prior to entering the central pump house.

- The only raw water sample tap in the RV pump house building is a threaded spigot located on a dead end line after the two captive air tanks. I recommend you install a smooth nose sample tap in the pump house close to where the supply line enters the building to take potential raw water source samples.

TREATMENT:

Bitterroot Gateway Mobile Home Park did not have treatment facility at the time of this inspection.

DISTRIBUTION:

Distribution is essentially split into a mobile home section and an RV section. The sections can be operated independently or together, and each section has the capacity to serve the entire system if needed.

- There are two direct cross connections between the potable water system and buried irrigation lines. Both of these connections have been determined to be significant deficiencies and **must be corrected**. Please see the significant deficiency information on the following pages. I recommend you contact the State Backflow Specialist (Karl Carlson 406-247-4444) if you have any questions and/or concerns about the appropriate valve needed for each location.

STORAGE:

Bitterroot Gateway Mobile Home Park did not have a storage facility at the time of this inspection.

PUMPS, PUMP FACILITIES and CONTROLS:

The SubDrive 300VFD control box in the central pump house has a date written on the top of 10/21/2009. I assume the submersible in well 1 (WL002) was changed at that time based on the pump assembly stickers on the control panel. It appears the pump model number is 60FA3S4-PE and the 5 hp submersible motor is a model 2343178600. See attached pictures.

MONITORING, REPORTING and DATA VERIFICATION:

- For the purpose of clarity, Bitterroot Gateway MHP has two source wells and two entry points. Water is served to multiple connections from both wells before the two sources are plumbed together in the central pump house. This means source sampling must be completed from each well to meet DEQ PWS requirements.
- Bitterroot Gateway MHP had a health advisory issued to them in August of 2012 and a subsequent violation for failing to take the required source water samples at WL002 and WL003 to meet the Ground Water Rule. Compliance has been achieved on all three violations.

MAINTENANCE, MANAGEMENT, SAFETY and OPERATION:

- Management and operation of Bitterroot Gateway MHP is questionable. Your mobile home and RV park was actually due for a sanitary survey in 2012, but failed to reply to the Missoula County inspector's requests. Greg Butts (DEQ, Kalispell) sent a letter on 12/10/2013 requesting a reply to set up the required sanitary survey inspection and received no reply (letter attached). I made multiple phone calls and left several voice messages in 2013 before receiving a voice message from you requesting a sanitary survey at 8 am on 9/24/2013. I called back and left a message confirming the date and time of inspection. I then called the day before the planned inspection and left a voice message to remind you that I'd be there the following morning. I was at Bitterroot Gateway Mobile Home Park in Lolo at 7:55 am on 9/24/2013 and was greeted by your son, Bo. He told me you couldn't make it, but he had opened up both pump houses at

your request for me to complete the scheduled inspection. Bo then left for work and I reluctantly completed the inspection with no representative on site.

- The State database shows Bitterroot Gateway MHP has 30 residential mobile home lots and 23 transient RV slips. The RV park had 18 active service connections at the time of this inspection and all the units appear to have been there for years. I noted wood piles, sheds, broken down vehicles, skirting, equipment, trailers and an accumulation of other various items that are common to a primary residence. Your RV park manager (Karen) and maintenance man (Ronnie) are two of these active residential connections. The data base will be corrected to reflect this change of use. The data base will now show there are 48 residential connections and 5 transient connections on the Bitterroot Gateway MHP system. It appears most of the service connections in the RV section of the park only serve one or two customers so I multiplied the 18 newly designated residential connections by 1.5. This brings your total residential population to 96 and changes the transient population to 10. Please feel free to call me at 406-755-8971 if you feel this change is unwarranted.
- The RV park appears to have been constructed in the 1960's and pre-dates the sanitation act of 1973. I assume this means the RV park doesn't have a COSA. With that said, I recommend you contact Barbara Kingery at 406-444-5368 to make sure additional subdivision review isn't required.

OPERATOR COMPLIANCE WITH STATE REQUIREMENTS:

You are listed as the owner, administrative contact, financial contact and certified operator (#4997) for the Bitterroot Gateway Mobile Home Park system within the State data base.

- Community public water supply systems that serve unchlorinated groundwater serving between 100 and 2,500 people must have a class 4AB certified operator. DEQ PWS records show your system serves over 100 people and you only a class 5AB certification. Please contact Reta Therriault (444-3434) or Julie Allen (444-4584) to update your certification level.
- The June 2009 sanitary survey completed by Ken Anderson of Missoula County stated "In your occasional absence the monthly sampling has been completed by your son with instructions you have provided." This is not acceptable because all bacteriological and chemical sampling for community public water systems must be completed by a certified water operator.
- I highly recommend you have a second certified water operator available to be in responsible charge while you're away from the system.

WASTERWATER

I could not confirm the exact locations of the mobile home park and RV park wastewater components at the time of this inspection because you were unable to attend the inspection. However, I did not observe wastewater components that appeared to threaten either source well at the time of this inspection.

- The change of 18 RV slips from transient to residential use may affect your current Missoula County wastewater permit.

Significant Deficiencies and Immediate Action Required:

Significant deficiencies may include, but are not limited to, defects in design, operation, or maintenance or a failure or malfunction of the sources, treatment, storage, or distribution system that the State determines to be causing or has the potential for causing the introduction of contamination into the water delivered to consumers.

The state of Montana adopted the federal Ground Water Rule (ARM 17.38.211) effective December 1, 2009. The Ground Water Rule establishes strict time lines for the identification of significant deficiencies, DEQ notification of the PWS system owner of the significant deficiency and the implementation of corrective action by the PWS.

The Department has established a Significant Deficiency Review Committee (Committee) to review deficiencies identified during a sanitary survey inspection or site visit to determine if they meet the Department's interpretation of significant. During this inspection, the following deficiency was identified and the DEQ Committee has determined that it meets the definition of significant:

- 1. Cross connection with inadequate backflow protection between the potable water system and buried irrigation system at the mobile home park pump house.**
- 2. Cross connection with inadequate backflow protection between the potable water system and buried irrigation system in the RV park valve vault.**

The Bitterroot Gateway Mobile Home Park PWS will be receiving separate correspondence from Elizabeth Henrikson, DEQ Ground Water Rule Manager, that will outline regulatory requirements and time lines for correcting this significant deficiency. Upon receipt of this letter, it is recommended that you immediately contact Mrs. Henrikson (444-2691).

If you have any questions about this report or public water supply regulations please give me a call at 406-755-8971.

Sincerely,



Mike Kropp
Environmental Science Specialist
DEQ PWS Kalispell
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CC: Helena PWS file
Barbara Kingery
Kalispell PWS file
Missoula County

SANITARY SURVEY FORM – WELLS & WELL PUMPS

PWSID **MT0000443**

SYSTEM NAME **Bitterroot Gateway Mobile Home Park Lolo**

(Please copy this sheet for additional wells & pumps)

COMPLETE ONE PAGE FOR EACH SOURCE

STATUS OF SOURCE (A)ctive (I)nactive (P)roposed

WSF ID WL002 *Entry Point ID* EP502

These are State assigned identification numbers

Source Name well 1 GWIC 67505

Example: Well 1 or South well, etc.

Location of Water Source (TRS or street address) T12N R20W sec 35

Entry Point Name EP for well 1

Example: EP for North Well 1 & South Well 2

Entry Point is at WSF ID EP502 @ WL002

EP is at the first water system facility with finished water.

Available Perm Emerg Interim Seasonal Other

If seasonal: _____ to _____

GWUDISW PA Completed Yes No

Log Available? Yes No

Average Production unknown
indicate units

Maximum Production unknown
indicate units

Date Drilled 11/12/1986
if well, date drilled

Casing Size 6"
size of casing installed in well

Case Depth 97'
depth of casing installed in well

Well Depth 101'
depth of well expressed in feet

Grout Depth 20' cement
depth of grout used to seal well walls

Log SWL 14'
(static) expressed in feet below ground elevation

Log PWL 21'
(pumping) expressed in feet below ground elevation

Test Pump Rate 160 gpm for 3.5 hr
expressed in gallons per min

Intake Type slots
example: screen, slots, perforations, open

Screened Interval 77' to 97'
expressed in feet below ground elevation

Well Yield unknown
pump tested in gallons per minute

Latitude 46.75514°
in decimal degrees

Longitude -114.07944°
in decimal degrees

WELLS

PUMPS

Is well metered? Yes No Unk N/A

Is well site protected from flooding?

Is well protected from potential sources of pollution (includes: surface water, known chemical spills, agricultural use, etc.)?

If no ... explain Well is next to main roadway and has 24" diameter vault immediately next to the wellhead.

Does casing extend at least
 18 inches above outside ground level;
 12 inches above finished floor inside well house; and
 3 feet above 100 year flood elevation?
(Check for appropriate distance)

Is top of the well casing properly sealed? (sanitary seal)

Is well vented?

Is well vent properly screened and terminated in a downward position?

Does well have suitable sampling tap? Raw Water
Treated

Are check valves, blow-off valves and water meters maintained and operating properly?

Is upper termination of well protected (housed or fenced)?

Is intake located below the maximum drawdown?

Type 5 hp submersible model 2343178600 with VFD controls
(example: 30 hp line shaft turbine)

Rated Capacity unknown

Are pumps operable? Yes No Unk N/A

How frequently are pump(s) replaced? 10/2009

Are backup pumps/motors provided?

Are controls functioning properly and adequately protected?

Do underground compartments have a drain?

Is facility properly protected against trespassing and vandalism?

Are pump records maintained (amp, drawdown, discharge, pressure, maintenance schedule, manuals, etc.)?

Is the plumbing adequately painted to prevent excessive corrosion?

Are adequate heating, lighting, and ventilation provided?

Is a preventive maintenance program in operation?

Are recommended spare parts on hand?

Cross connection protection provided?

Comment: Wellhead has an a 24" old valve box immediately next to the well casing that could potentially offer an place for contaminants to enter the source water. Recommend removing vault and backfilling hole. Casing extends approximately 14" above ground level and is sealed/vented. Raw water samples would need to be taken at one of the first services because there isn't a sample tap at the wellhead.

Explain Controls: VFD sensor and SubDrive 300 FPS 4400 trigger submersible pump operation.

Comment: I'm assuming the submersible was replaced on 10/21/2009 because someone wrote it on the VFD control panel with new pump and motor stickers after the previous inspection.

SANITARY SURVEY FORM – WELLS & WELL PUMPS

PWSID **MT0000443**

SYSTEM NAME **Bitterroot Gateway Mobile Home Park Lolo**

(Please copy this sheet for additional wells & pumps)

COMPLETE ONE PAGE FOR EACH SOURCE

STATUS OF SOURCE (A)ctive (I)nactive (P)roposed

WSF ID WL003 Entry Point ID EP503

These are State assigned identification numbers

Source Name well 2 GWIC 67508

Example: Well 1 or South well, etc.

Location of Water Source (TRS or street address) T12N R20W sec35

Entry Point Name EP for well 2

Example: EP for North Well 1 & South Well 2

Entry Point is at WSF ID EP503 at WL003

EP is at the first water system facility with finished water.

Available Perm Emerg Interim Seasonal Other

If seasonal: _____ to _____

GWUDISW PA Completed Yes No

Log Available? Yes No

Average Production unknown
indicate units

Maximum Production unknown
indicate units

Date Drilled 4/3/1967
if well... date drilled

Casing Size 6"
size of casing installed in well

Case Depth 83'
depth of casing installed in well

Well Depth 95'
depth of well expressed in feet

Grout Depth no grout record
depth of grout used to seal well walls

Log SWL 14.5'
(static) expressed in feet below ground elevation

Log PWL 63'
(pumping) expressed in feet below ground elevation

Test Pump Rate 300 gpm for 6.5 hr
expressed in gallons per min

Intake Type Johnson screen and tail pipe
example: screen, slots, perforations, open

Screened Interval 82' to 92'
expressed in feet below ground elevation

Well Yield unknown
pump tested in gallons per minute

Latitude 46.75619°
in decimal degrees

Longitude -114.07931°
in decimal degrees

WELLS

PUMPS

Is well metered? Yes No Unk N/A

Is well site protected from flooding?

Is well protected from potential sources of pollution (includes: surface water, known chemical spills, agricultural use, etc.)?

If no... explain Toe of bank with parking lot above. Roadway near wellhead.

Does casing extend at least
 18 inches above outside ground level;
 12 inches above finished floor inside well house; and
 3 feet above 100 year flood elevation?
(Check for appropriate distance)

Is top of the well casing properly sealed? (sanitary seal)

Is well vented?

Is well vent properly screened and terminated in a downward position?

Does well have suitable sampling tap? Raw Water
Treated

Are check valves, blow-off valves and water meters maintained and operating properly?

Is upper termination of well protected (housed or fenced)?

Is intake located below the maximum drawdown?

Type 3 hp Red Jacket model 8FC-T300N4 submersible
(example: 30 hp line shaft turbine)
Rated Capacity unknown

Yes No Unk N/A

Are pumps operable?

How frequently are pump(s) replaced? _____

Are backup pumps/motors provided?

Are controls functioning properly and adequately protected?

Do underground compartments have a drain?

Is facility properly protected against trespassing and vandalism?

Are pump records maintained (amp, drawdown, discharge, pressure, maintenance schedule, manuals, etc.)?

Is the plumbing adequately painted to prevent excessive corrosion?

Are adequate heating, lighting, and ventilation provided?

Is a preventive maintenance program in operation?

Are recommended spare parts on hand?

Cross connection protection provided?

Comment: Raw water sample can be pulled from the threaded spigot immediately after the captive air tanks if needed.

Explain Controls: Pressure swich triggers submersible operation.

Comment: The control panel control box has a submersible tag on it showing this is a 3 hp Red Jacket. The actual size was not confirmed.

SANITARY SURVEY FORM - PRESSURE CONTROL ASSEMBLIES

PWSID **MT0000443**

SYSTEM NAME **Bitterroot Gateway Mobile Home Park Lolo**

CAPTIVE AIR TANK(S)

PRESSURE TANK(S)

NO TANK(S)

WSF ID PC001 Location: MHP pump house
 Latitude 46.75518^o in decimal degrees
 Longitude -114.07941^o in decimal degrees
 Pump size and type 5 hp submersible (ex: 3 hp submersible)
 Rated Capacity unknown Pump installation date: 10/2009
 Pump run time did not cycle Time of day _____
 Cut-In _____ psi Cut-Out _____ psi

- | | Yes | No | Unk | N/A |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Are redundant booster pumps provided? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are spare pumps/motors provided? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there automatic cutoff for low suction pressure? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a compound pressure gauge prior to the pump? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a standard pressure gauge after the pump? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the low pressure level provide adequate pressure? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a pressure relief valve? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the pressure relief valve properly sized? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the tank operating properly (not water logged)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the tank(s) air charge system adequate? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is exterior surface of the tank(s) in good physical condition? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Can tank(s) be by-passed for repair? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a water level sight glass? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a bottom drain valve on the tank(s)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there adequate heating, lighting, and ventilation? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Do underground compartments have a drain? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Are controls protected and functioning properly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are pump records maintained (amp, pressure, maintenance schedule, manuals, etc.)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is facility properly protected against trespass? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the plumbing protected from excessive corrosion? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Is a preventive maintenance program in operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Describe components and controls: _____

Comments: System was static at 47 psi at time of inspection. WL003 acts as a redundant pump to WL002.

WSF ID PC002 Location: RV park pump house
 Latitude 46.75618^o in decimal degrees
 Longitude -114.07931^o in decimal degrees
 Pump size and type 3 hp submersible (ex: 3 hp submersible)
 Rated Capacity unknown Pump installation date: unknown
 Pump run time did not cycle Time of day _____
 Cut-In _____ psi Cut-Out _____ psi

- | | Yes | No | Unk | N/A |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Are redundant booster pumps provided? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are spare pumps/motors provided? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there automatic cutoff for low suction pressure? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a compound pressure gauge prior to the pump? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a standard pressure gauge after the pump? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the low pressure level provide adequate pressure? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a pressure relief valve? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the pressure relief valve properly sized? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Is the tank operating properly (not water logged)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the tank(s) air charge system adequate? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is exterior surface of the tank(s) in good physical condition? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Can tank(s) be by-passed for repair? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a water level sight glass? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there a bottom drain valve on the tank(s)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is there adequate heating, lighting, and ventilation? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Do underground compartments have a drain? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Are controls protected and functioning properly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are pump records maintained (amp, pressure, maintenance schedule, manuals, etc.)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is facility properly protected against trespass? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Is the plumbing protected from excessive corrosion? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Is a preventive maintenance program in operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Describe components and controls: _____

Comments: System was static at 46 psi at time of inspection.

SANITARY SURVEY FORM - MISCELLANEOUS

PWSID **MT0000443**

SYSTEM NAME **Bitterroot Gateway Mobile Home Park Lolo**

DISTRIBUTION SYSTEM EVALUATION

WSF ID DS001

- | | Yes | No | Unk | N/A |
|---|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| System drawings available? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Accurate As-Built drawing(s) on-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Lines adequately sized? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Adequate pressure maintained? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Mains protected from freezing? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Distribution system free of leaks? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Asbestos concrete pipe used? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Fire hydrants? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Dead end lines minimized by looping mains? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Flushing program? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Pressure reducing stations? Number _____ | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Booster stations? Number _____ | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Are individual booster pumps on any service lines?
(see DEQ-1 6.4.4) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Were cross connections observed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | | |

Describe distribution: Distribution can be charged from either, or both wells and pressure controls.

Comments: Cross connection to buried irrigation system at two locations with inadequate backflow protection.

SAFETY

Were confined spaces observed?

Yes No Unk N/A

Describe any confined spaces observed Valve vault s next to WL002 and irrigation valve vault in RV area.

Confined space safety adequate?

Fall risks adequately mitigated?

Note all safety deficiencies (consider items such as ladders, tank supports, guards on rotating electrical equipment, lightning protection for pumps, etc.)

* The valve vault next to WL002 has a wooden framed lid that is covered with sheet metal and set loosely on the ground level opening.

* The buried irrigation system in the RV area has a valve vault that is an enclosed space.

MONITORING AND RECORDKEEPING EVALUATION

- | | Yes | No | Unk | N/A |
|--|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| Does the system have a current Monitoring Schedule? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Bacti monitoring records maintained? (5 years) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Bacti Sample Site Plan submitted? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Familiar with repeat sampling? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Chemical monitoring records maintained? (10 years) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| System specific records / plans maintained?
(DBP, PB/CU, treatments, waivers, violations, etc.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Familiar with Public Notice requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Did Surveyor take a bacteriological sample? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | | |

If Yes, date of Sample: _____ Time of Sample: _____

Comments: _____

* HA violation issued in 8/2012 based on bacteriological failures. Compliance achieved.

* Violations issued in 9/2012 for FTM wells for GWR. Compliance achieved.

MANAGEMENT

- | | Yes | No | Unk | N/A |
|---|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| Are there sufficient personnel? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Are operators properly certified? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Are personnel adequately trained? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Is there a current O&M manual on-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Is an emergency plan on-site and workable? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Has system addressed concerns from previous sanitary survey(s) or technical visit(s)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Budget exists? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Does system maintain an emergency fund? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Does system contribute to facility replacement fund? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Are abandoned wells present? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Do abandoned wells appear to be properly abandoned?
(see ARM 36.21.670) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Comments: System has served over 100 people for several years and the owner/operator is only a class 5AB operator. System operator should be a class 4 AB operator. Adequacy of managing the water system is largely unknown. Owner/operator never responded to requests for inspecting the system in 2012 and attempts to schedule an inspection in 2013 were unanswered until this inspection was set by owner over 1 month in advance. A message was left on owners machine the day before the inspection to serve as a reminded. Owner still did not attend the inspection. I believe this reflects poor O & M of the system.

PWSID MT0000443

SYSTEM NAME Bitterroot Gateway Mobile Home Park Lolo

The State, or an authorized agent, must conduct sanitary surveys for all public water supply systems in Montana. DEQ believes that periodic sanitary surveys, along with appropriate corrective actions, are indispensable for assuring the long-term quality and safety of drinking water. When properly conducted, sanitary surveys can provide important information on a water system's design and operations and can identify minor and significant deficiencies for correction before they become major problems.

Minor deficiencies do not pose serious health threats. However, corrective action of minor deficiencies can be critical in the long-term operation and safety of a public water system. Minor deficiencies are generally described as suggested or recommended corrections in the letter to system owner(s).

Significant deficiencies can be defined as a defective water supply component(s) having or likely to have an adverse influence on public health. Significant deficiencies require immediate corrective action in efforts to protect consumers.

EPA and ASDWA guidance identifies eight broad components that should be covered in a sanitary survey. Using these eight broad components as a guide, minor and significant deficiencies should be described in the letter to system owner(s).

- | | |
|---------------------------|--|
| 1) Source | 5) Pumps, pump facilities, and controls |
| 2) Treatment | 6) Monitoring and reporting, and data verification |
| 3) Distribution system | 7) System management and operation |
| 4) Finished water storage | 8) Operator compliance with State requirements |

With consideration that significant deficiencies may influence regulatory decisions and monitoring requirements, please list all significant deficiencies observed and corrective action(s) taken below.

Comments:

1. Cross connection with inadequate backflow protection between the potable water system and buried irrigation system at the mobile home park pump house.

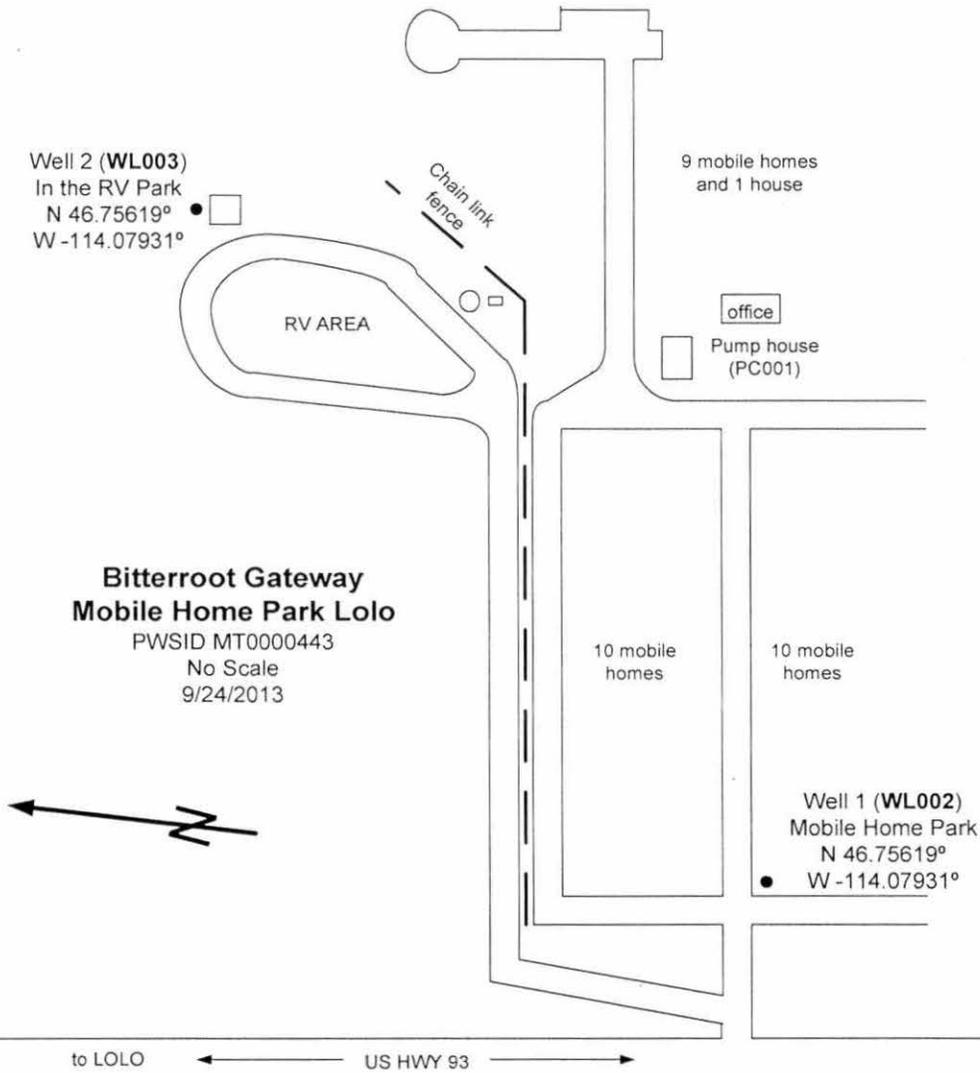
2. Cross connection with inadequate backflow protection between the potable water system and buried irrigation system in the RV park valve vault.

SANITARY SURVEY FORM - DIAGRAMS

PWSID MT0000443

SYSTEM NAME Bitterroot Gateway Mobile Home Park Lolo

Please insert schematics, diagrams and maps as needed. Additional sheets may be added.

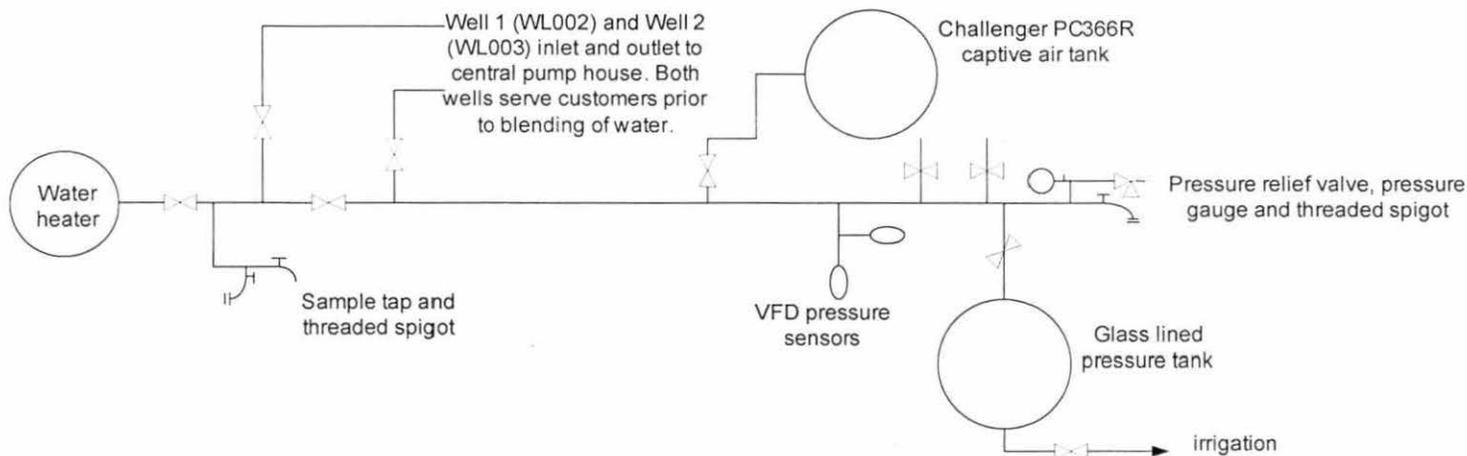




Well 2 (WL003) and pump house (PC002) in RV Park area

Pump house (PC001) in mobile home park

Well 1 (WL002) in mobile home park

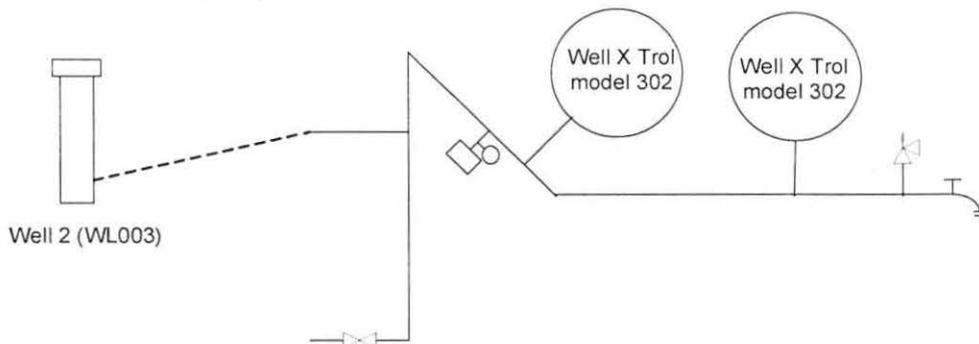


Central pump facility in mobile home park

Bitterroot Gateway MHP Lolo

PWSID MT0000443
No Scale

RV park pump facility



Site Name: BITTERROOT GATEWAY MOBILE PK S. WELL 01
 GWIC Id: 67505
 DNRC Water Right: C064536-00

Section 1: Well Owner(s)

1) TERRY, BURKHOLDER (MAIL)
 PO BOX 20185
 MISSOULA MT 59801 [10/22/1999]
 2) TRIPP, DON (MAIL)
 BOX 69
 LOLO MT 59847 [11/12/1986]

Section 2: Location

Township	Range	Section	Quarter Sections			
12N	20W	35	SW¼	SW¼	SE¼	NW¼
County			Geocode			
MISSOULA						
Latitude	Longitude	Geomethod	Datum			
46.755	114.0813	UNKNOWN	NAD27			
Ground Surface Altitude		Method	Datum	Date		
3180						
Addition	Block		Lot			

Section 3: Proposed Use of Water

PUBLIC WATER SUPPLY (1)

Section 4: Type of Work

Drilling Method: ROTARY
 Status: NEW WELL

Section 5: Well Completion Date

Date well completed: Wednesday, November 12, 1986

Section 6: Well Construction Details

Borehole dimensions

From	To	Diameter
0	101	6

Casing

From	To	Diameter	Wall Thickness	Pressure Rating	Joint	Type
-3.5	97	6				STEEL

Completion (Perf/Screen)

From	To	Diameter	# of Openings	Size of Openings	Description
77	97	6		1/8X1	PULL DOWN SLOTS

Annular Space (Seal/Grout/Packer)

From	To	Description	Cont. Fed?
0	20	CEMENT	

Section 7: Well Test Data

Total Depth: 97
 Static Water Level: 14
 Water Temperature:

Pump Test *

Depth pump set for test _ feet.
 160 gpm pump rate with _ feet of drawdown after 3.5 hours of pumping.
 Time of recovery _ hours.
 Recovery water level _ feet.
 Pumping water level 21 feet.

** During the well test the discharge rate shall be as uniform as possible. This rate may or may not be the sustainable yield of the well. Sustainable yield does not include the reservoir of the well casing.*

Section 8: Remarks

Section 9: Well Log

Geologic Source

111ALVM - ALLUVIUM (HOLOCENE)

From	To	Description
0	8	CLAY SAND AND GRAVEL
8	12	CLAY SAND GRAEL AND SEEPS OF WATER
12	31	SAND GRAVEL AND WATER
31	38	SAND AND WATER
38	51	SAND GRAVEL AND WATER
51	56	SILTY CLAY SAND GRAVEL AND WATER
56	74	SAND VERY SMALL GRAVEL AND WATER
74	97	SAND GRAVEL AND WATER
97	101	CLAY GRAVEL AND BOULDERS

Driller Certification

All work performed and reported in this well log is in compliance with the Montana well construction standards. This report is true to the best of my knowledge.

Name:
 Company: CAMP WELL DRILLING
 License No: WWC-7
 Date Completed: 11/12/1986

063

12N 20W 35 BDC

Missoula
File No. _____

Form No. 603 (R 6-84)

WELL LOG REPORT

011130

State law requires that this form be filed by the water well driller within 60 days after compl.

<p>1. WELL OWNER <u>Bitterroot Gateway Mobile Park</u> Name <u>DOH TRIPP</u></p>	<p>8. WATER LEVEL Static water level <u>14</u> feet below land surface If flowing: closed-in pressure _____ psi <u> </u> gpm Controlled by: _____ valve, _____ reducers, _____ other, (specify) _____</p>																											
<p>2. CURRENT MAILING ADDRESS <u>Box 69</u> <u>Leola, Montana 59647</u></p>	<p>9. WELL TEST DATA _____ pump _____ bailer other, (specify) _____ Pumping water level below land surface: <u>21</u> ft. after <u>30</u> hrs. pumping <u>100</u> gpm _____ ft. after _____ hrs. pumping _____ gpm</p>																											
<p>3. WELL LOCATION <u>RWS Survey</u> County <u>Missoula</u> Township <u>12 N</u> N/S Range <u>20 W</u> E/W <u>SW 1/4</u> <u>SW 1/4</u> <u>SW 1/4</u> Section <u>36</u> Lot _____ Block _____ Subdivision _____</p>	<p>10. WAS WELL PLUGGED OR ABANDONED? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, how? _____</p>																											
<p>4. PROPOSED USE Domestic <input type="checkbox"/> Stock <input type="checkbox"/> Irrigation <input type="checkbox"/> Other <input checked="" type="checkbox"/> specify <u>Trailer Court</u></p>	<p>11. DATE COMPLETED <u>November 12, 1986</u></p>																											
<p>5. DRILLING METHOD _____ cable, _____ bored, _____ forward rotary, _____ reverse rotary, _____ jetted, _____ other (specify) _____</p>	<p>12. WELL LOG Depth (ft.) From To Formation</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr><td>0</td><td>3</td><td>Clay, Sand & Gravel</td></tr> <tr><td>3</td><td>12</td><td>Clay, Sand, Gravel & Scans of Water</td></tr> <tr><td>12</td><td>31</td><td>Sand, Gravel & Water</td></tr> <tr><td>31</td><td>33</td><td>Sand & Water</td></tr> <tr><td>33</td><td>51</td><td>Sand, Gravel & Water</td></tr> <tr><td>51</td><td>56</td><td>Silty Clay, Sand, Gravel & Water</td></tr> <tr><td>56</td><td>74</td><td>Sand, very small gravel & Water</td></tr> <tr><td>74</td><td>97</td><td>Sand, Gravel & Water</td></tr> <tr><td>97</td><td>101</td><td>Clay, Gravel & Boulders</td></tr> </table>	0	3	Clay, Sand & Gravel	3	12	Clay, Sand, Gravel & Scans of Water	12	31	Sand, Gravel & Water	31	33	Sand & Water	33	51	Sand, Gravel & Water	51	56	Silty Clay, Sand, Gravel & Water	56	74	Sand, very small gravel & Water	74	97	Sand, Gravel & Water	97	101	Clay, Gravel & Boulders
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74	97	Sand, Gravel & Water																										
97	101	Clay, Gravel & Boulders																										
<p>6. WELL CONSTRUCTION AND COMPLETION</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Size of drilled hole</th> <th rowspan="2">Size and weight of casing</th> <th rowspan="2">From (feet)</th> <th rowspan="2">To (feet)</th> <th colspan="3">Perforations _____ and/or Screen _____</th> </tr> <tr> <th>Kind Size</th> <th>From (feet)</th> <th>To (feet)</th> </tr> </thead> <tbody> <tr> <td>6"</td> <td>6" ID +3/4" 17 lb per ft.</td> <td>+3/4"</td> <td>97</td> <td>slots full down 1 x 1/8"</td> <td>77</td> <td>97</td> </tr> </tbody> </table>	Size of drilled hole	Size and weight of casing	From (feet)	To (feet)	Perforations _____ and/or Screen _____			Kind Size	From (feet)	To (feet)	6"	6" ID +3/4" 17 lb per ft.	+3/4"	97	slots full down 1 x 1/8"	77	97	<p>13. DRILLER'S CERTIFICATION This well was drilled under my jurisdiction and this report is true to the best of my knowledge. Date <u>November 20, 1986</u> <u>CAMP WELL DRILLING & SUPPLY</u> Firm Name <u>1522 S. 14th W., Missoula, MT 59801</u> Address <u>Phil Bortke</u> Signature License No. _____</p>										
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	Kind Size	From (feet)	To (feet)																									
6"	6" ID +3/4" 17 lb per ft.	+3/4"	97	slots full down 1 x 1/8"	77	97																						
<p>7. WHAT IS THE TEMPERATURE OF THE WATER? <u>45</u> Degrees Fahrenheit <input type="checkbox"/> Measured <input checked="" type="checkbox"/> Estimated</p>	<p>Was casing left open end? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Was a packer or seal used? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If so, what material _____ Was the well gravel packed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Was the well grouted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No To what depth? <u>100 ft.</u> Material used in grouting <u>GRABENT</u> Well head completion: Pitless adapter <input type="checkbox"/> Yes <input type="checkbox"/> No Top of casing 12 in. or greater above grade <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>																											

MONTANA DEPARTMENT OF NATURAL RESOURCES & CONSERVATION



32 SOUTH EWING

HELENA, MONTANA 59620

444-6610

STATE PUBLISHING CO. HELENA, MONT.

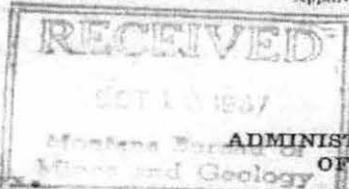
DEPARTMENT - BUREAU COPY

M: 67505

File No.

TRIPLICATE

LOG



1 063 T 12N R 20W 35
County Missoula B DCA

STATE OF MONTANA

ADMINISTRATOR OF GROUNDWATER
OFFICE OF STATE ENGINEER

012016

Top of Ground
(Elev. above sea level 3180')

Formations Log:

- 0 - 4 Gravel & fill
- 4 - 8 Sandy soil.
- 8 - 32 Silty sand & gravel. Some clay mixed in.
- 32 - 66 Fine silty sand & gravel.
- 66 - 78 Fine sand & gravel.
- 78 - 82 Coarse sand & fine gravel.
- 82 - 95 Coarse sand & gravel. Water.

Water rises in the well 14'6" from surface.

Notice of Completion of Groundwater Appropriation by Means of Well

DEVELOPED AFTER JANUARY 1, 1962

(Under Chapter 237, Montana Session Laws, 1961)

Owner: Vienna Tripp & Don Tripp Gateway Mobile Park
Address: Lolo, Montana

Driller: Liberty Drilling Co. Address: Missoula, Montana

Date of Notice of appropriation of groundwater: None filed

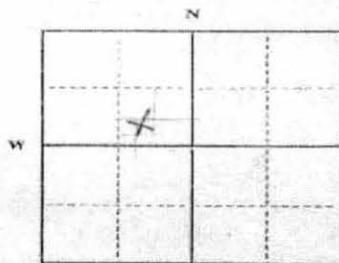
Date well started: 3/29/67 Date completed: 4/3/67

Type of well: Drilled Equipment used: Cable Tools
(Dug, driven, bored or drilled) (Churn drill, rotary or other)

Water use: Domestic Municipal Stock Irrigation
Industrial Drainage Other

Indicate on the diagram the character and thickness of the different strata met with in drilling, such as soil, clay, shale, gravel, rock or sand, etc. Show depth at which water is encountered, thickness and character of water-bearing strata and height to which the water rises in the well.

Size of Drilled Hole	Size and Weight of Casing	From (Feet)	To (Feet)	PERFORATIONS		
				Kind Size	From (Feet)	To (Feet)
6"	6 5/8" 60 x W"	+18	83'	A 100/1000 slot size Wire Wound Six inch Johnson Water well Screen	82	92
A tail pipe with solid closed bottom extends from				92	95	



PWS Survey - BOCA's

SE 1/4, NW 1/4
SE 1/4, NW 1/4, Sec. 55, T. 12 N. R. 20 W.
Indicate location of well and place of use, if possible. Each small square represents 40 acres.

Static Water Level for non-flowing well 14'6" feet.

Shut-in Pressure for Flowing Well Non-f

Pumping Water Level 63 feet at 300 gal. per minute.

Discharge in gal. per min. of flowing well Non-flowing

How Tested Air Lift Pump

Length of Test 6 1/2 hours

Remarks: (Gravel packing, cementing, packers, type of shutoff) All water entering well is coming through the slots openings in the Johnson Water Well Screen

(Continue on reverse side)

USE—If used for irrigation, industrial, drainage or other. Explain, state number of acres and location or other data (i.e.: Lot, Block and Addition).

Approx. 3.8 acres

Show exact depth of bottom.
Bottom of hole 95'

This form to be prepared by driller, and three copies to be filed by the owner with the County Clerk and Recorder in the county in which the well is located, tissue copy to be retained by driller.

Please answer all questions. If not applicable, so state, otherwise the form will be returned.

Driller's License Number

William F. Osborne
Driller's Signature.

M:67508



Bitterroot Gateway Mobile Home Park Lolo

PWSID MT0000443 date: 9/24/2013 representative: Bo Burkholder

Top center: This is a picture of the entrance to Bitterroot Gateway MHP just east of US Highway 93. Access to the mobile home park is straight ahead and the RV park entrance is at the left side of this picture.

Bottom left: This is a picture of well 2 (WL003) in the RV park.

Bottom right: This is a picture of well 1 (WL002) in the mobile home court. US Highway 93 can be seen in the background. The sheet metal covered box next to the wellhead is a fabricated lid to cover the old vault.





Bitterroot Gateway Mobile Home Park Lolo

PWSID MT0000443 date: 9/24/2013

representative: Bo Burkholder

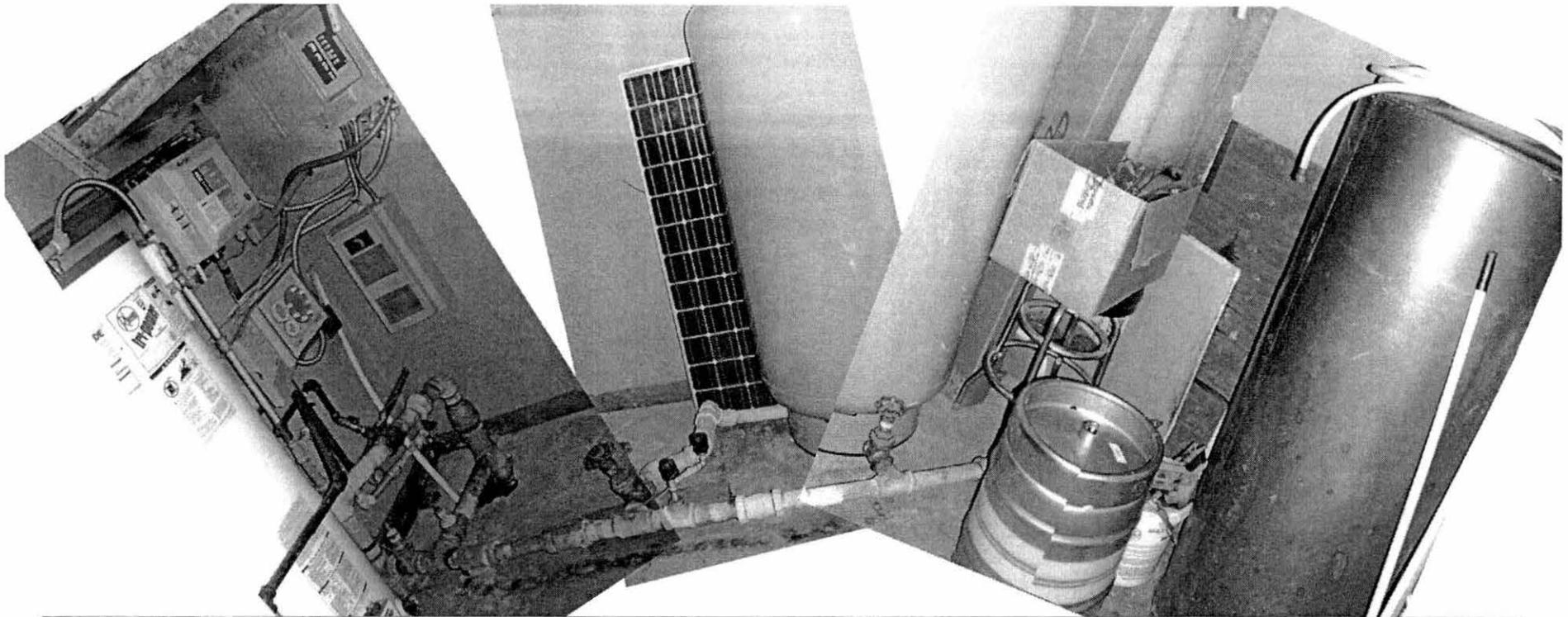
Top left: Second view of well 1 (WL002) looking into the mobile home court. Records show this well casing was extended out of the vault in May of 2009.

Bottom left: Well 1 (WL002) and control vault with the vault lid removed. The lid sits loosely on the top edge of the vault and can easily be pushed to the side. This could potentially be safety issue for residents or visitors. Multiple black widow spiders were noted under the lid during this inspection.



Middle right: Looking down into the well 1 (WL002) control valve vault. Any surface water runoff or other contaminant could easily use the vault as a conduit to adversely affect the well. This vault should really be removed and backfilled.

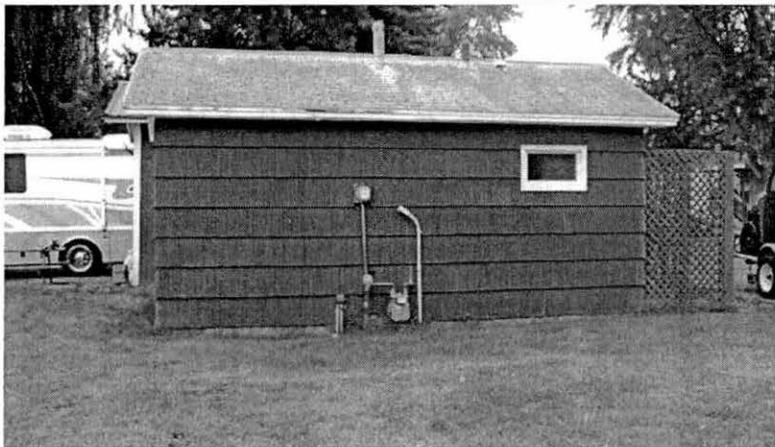




Top group of pictures: This shows the inside of the centrally located pump house. This pump house contains SubDrive 300 VFD controls with two sensors, one captive air tank and one pressure tank. There is an irrigation line that runs out the back of the pressure tank which has no backflow prevention assembly.

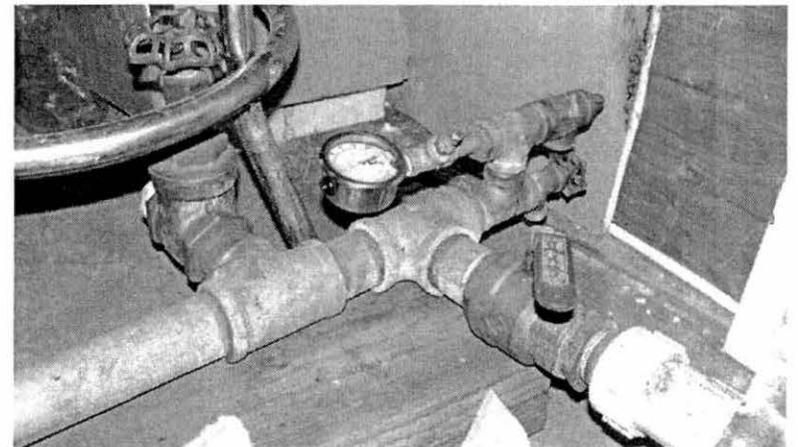
Bottom left: Picture of the centrally located pump house (PC001) that contains the components shown above. It appears two captive air tanks have been removed at some point.

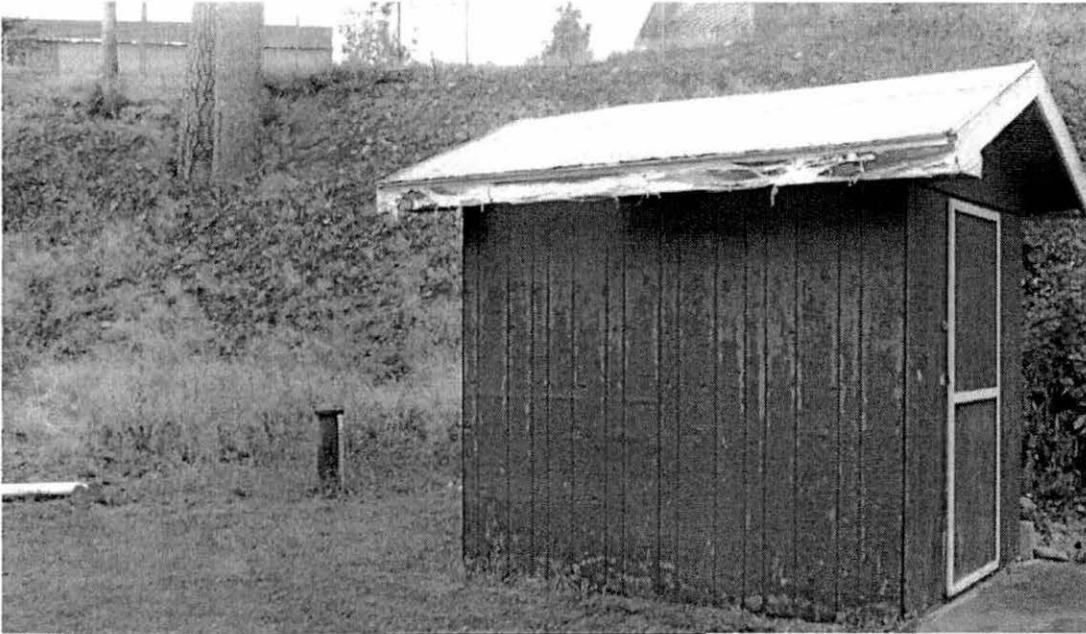
Bottom right: A close up of the line prior to the pressure tank shows a pressure gauge, pressure relief and a partially closed valve.



**Bitterroot Gateway
Mobile Home Park
Lolo**

PWSID MT0000443
date: 9/24/2013
representative:
Bo Burkholder





Bitterroot Gateway Mobile Home Park Lolo

PWSID MT0000443 date: 9/24/2013

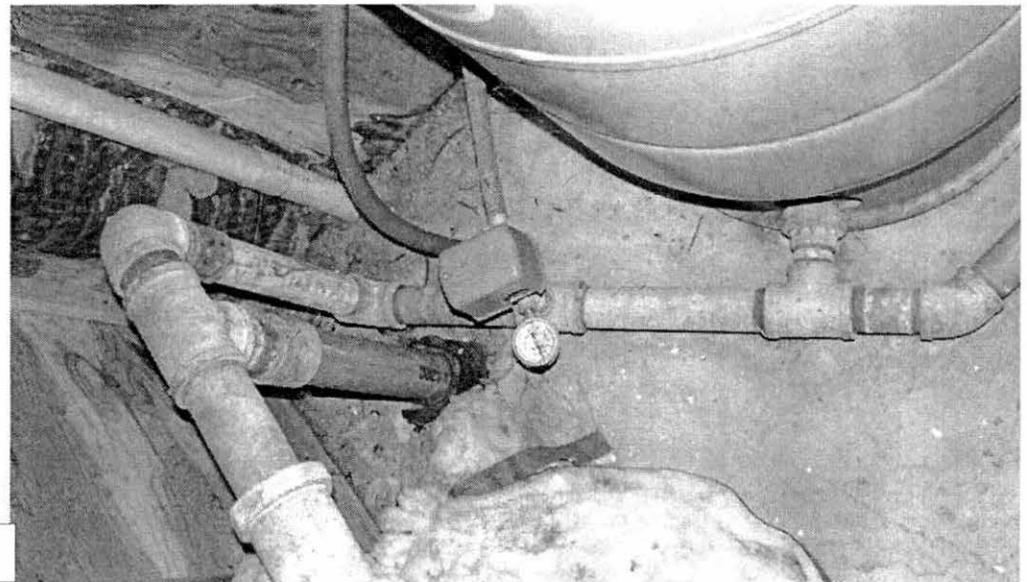
representative: Bo Burkholder

Top left: This picture shows well 2 (WL003) and pump house which are located in the easterly side of the RV park area.



Bottom left: This two pictures show the inside of the well 2 pump house (PC002). The control panel at the left of this picture is not connected to the system. The captive air tanks do not have independent isolation valves and are located on a dead end line.

Bottom right: Picture in the northeast corner of the well 2 pump house show the well 2 (WL003) entrance pipe, pressure switch and pressure gauge.





Bitterroot Gateway Mobile Home Park Lolo

PWSID MT0000443 date: 9/24/2013

representative: Bo Burkholder

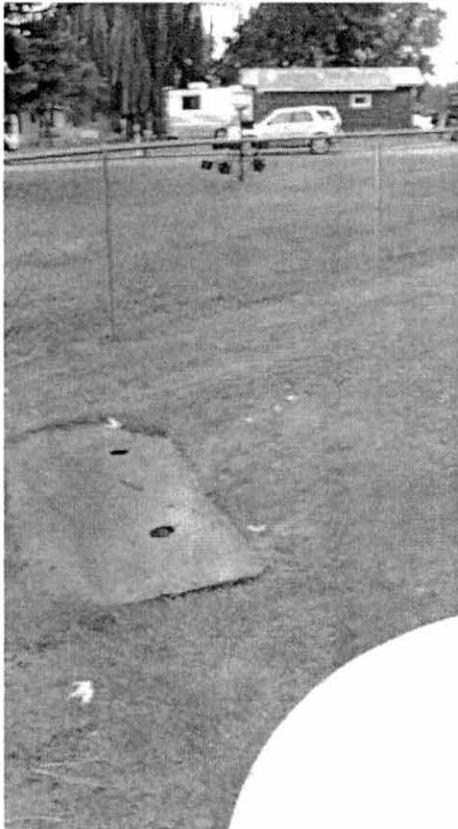
Top left: A CMP (corrugated metal pipe) extends out of the ground in the RV park. The central pump house located in the mobile home park can be seen in the background, with a chain link fence separating the MHP and RV park.

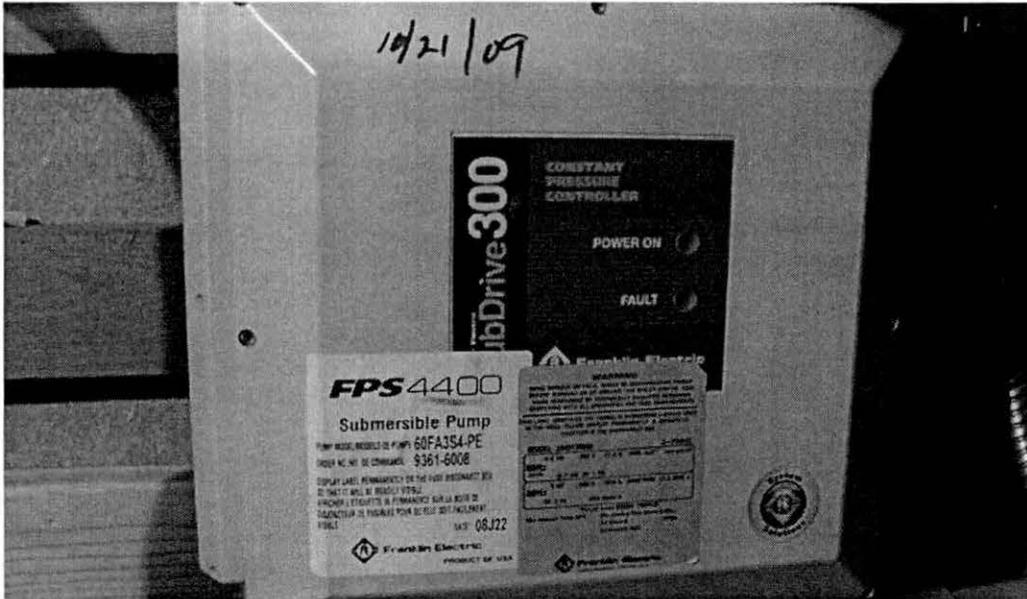
Bottom right: This picture was taken looking into the CMP vault. The vault contains a control valve on the water main and a curb stop valve on a 2" PVC line that extends out the side of the metal side.

Bottom left: The CMP lid is shown at the lower right part of this picture with a piece of plywood covering something in the lawn.

Bottom middle: Lifting up the plywood shows there are multiple buried irrigation zones that extend off the 2" line and there is no backflow protection assembly. Note: The small diameter pipe in this picture is actually a valve wrench.

Page 5 of 6



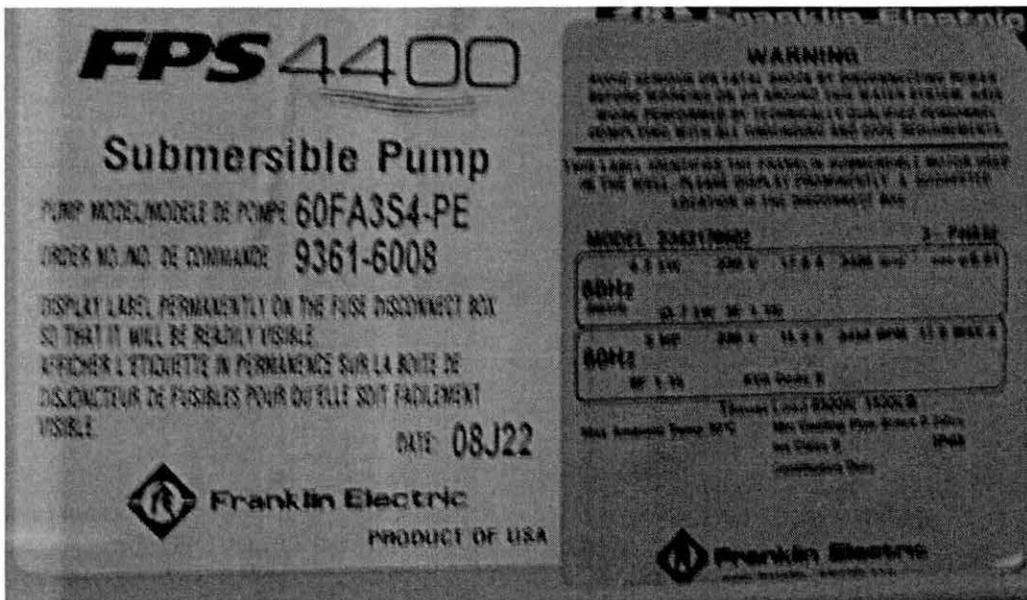
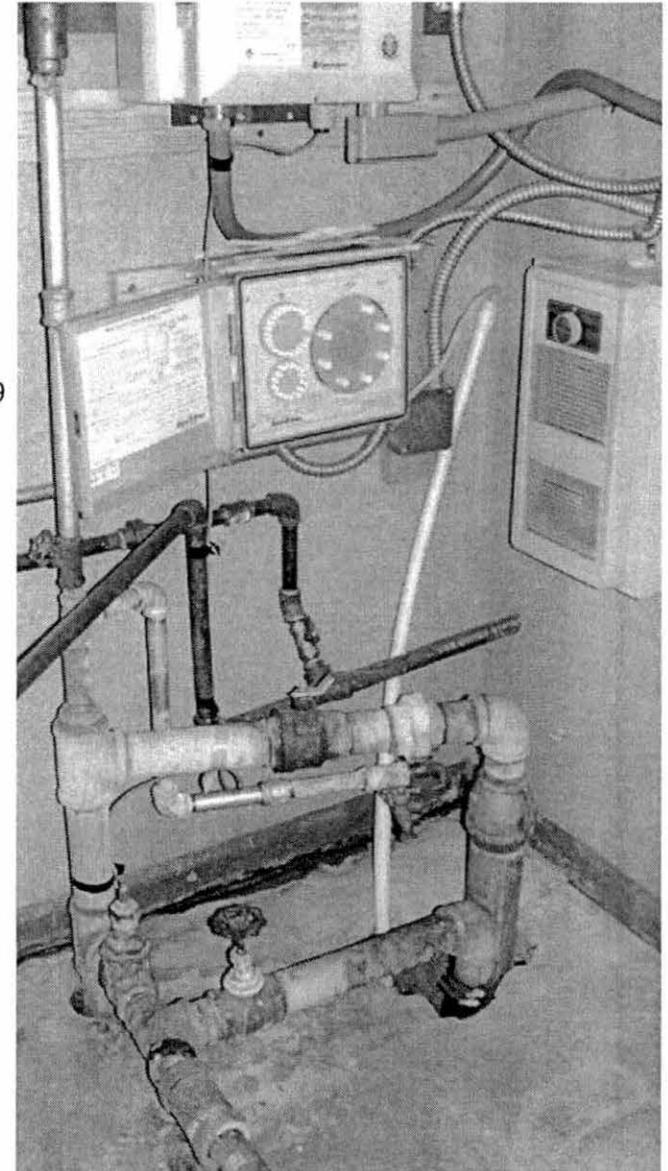


Top left: Franklin SubDrive 300 VFD control box in the central pump house (PC001) has a date of 10/21/2009 and pump information stickers on it that weren't there during the June 22, 2009 inspection. I assume the well 1 (WL002) submersible was replaced at this time as the specifications are shown below (pump model 60FA3S4-PE and 5hp submersible 2343178600). **Bottom right:** Both well 1 (WL002) and well 2 (WL003) enter the central pump house and join together in the building. Both well supply lines serve many services prior to this connection.

Bitterroot Gateway Mobile Home Park Lolo

PWSID MT0000443 date: 9/24/2013

representative: Bo Burkholder



10/7/2013

Bitterroot Gateway Mobile Home Park Lolo
Attn.: Terry Burkholder
P.O. Box 1292
Lolo, MT 59847

Re: Sanitary Survey Inspection of Bitterroot Gateway Mobile Home Park
(PWSID: MT0000443).

Dear Mr. Burkholder,

I would like to thank your son, Bo, for opening both pump houses before he left for work so I could complete the sanitary survey inspection of Bitterroot Gateway Mobile Home Park. As a transient water supply system, your facility is required to have a sanitary survey inspection every three years. These regular inspections offer us an opportunity to look for sanitary deficiencies that have the potential to cause contamination in the water system, as well as pointing out operation and maintenance concerns. Below are a few comments relating to the sanitary survey conducted on 9/24/2013.

SOURCE(s):

Well 1 (WL002) construction information can be reviewed in GWIC log 67505 (attached). WL002 is located in the southwest corner of the mobile home park and serves several customers in that area prior to entering the central pump house (PC001).

- I recommend the valve vault located immediately next to WL002 be removed and the hole backfilled. This valve vault is a safety concern, potential liability and could serve as a conduit for contaminants to affect the well source.
- WL002 does not have a raw water sampling tap prior to the first service.

Well 2 (WL003) construction information can be reviewed in GWIC log 67508 (attached). WL003 is located in the northeast corner of the RV park and serves all customers in that area prior to entering the central pump house.

- The only raw water sample tap in the RV pump house building is a threaded spigot located on a dead end line after the two captive air tanks. I recommend you install a smooth nose sample tap in the pump house close to where the supply line enters the building to take potential raw water source samples.

TREATMENT:

Bitterroot Gateway Mobile Home Park did not have treatment facility at the time of this inspection.

DISTRIBUTION:

Distribution is essentially split into a mobile home section and an RV section. The sections can be operated independently or together, and each section has the capacity to serve the entire system if needed.

- There are two direct cross connections between the potable water system and buried irrigation lines. Both of these connections have been determined to be significant deficiencies and **must be corrected**. Please see the significant deficiency information on the following pages. I recommend you contact the State Backflow Specialist (Karl Carlson 406-247-4444) if you have any questions and/or concerns about the appropriate valve needed for each location.

STORAGE:

Bitterroot Gateway Mobile Home Park did not have a storage facility at the time of this inspection.

PUMPS, PUMP FACILITIES and CONTROLS:

The SubDrive 300VFD control box in the central pump house has a date written on the top of 10/21/2009. I assume the submersible in well 1 (WL002) was changed at that time based on the pump assembly stickers on the control panel. It appears the pump model number is 60FA3S4-PE and the 5 hp submersible motor is a model 2343178600. See attached pictures.

MONITORING, REPORTING and DATA VERIFICATION:

- For the purpose of clarity, Bitterroot Gateway MHP has two source wells and two entry points. Water is served to multiple connections from both wells before the two sources are plumbed together in the central pump house. This means source sampling must be completed from each well to meet DEQ PWS requirements.
- Bitterroot Gateway MHP had a health advisory issued to them in August of 2012 and a subsequent violation for failing to take the required source water samples at WL002 and WL003 to meet the Ground Water Rule. Compliance has been achieved on all three violations.

MAINTENANCE, MANAGEMENT, SAFETY and OPERATION:

- Management and operation of Bitterroot Gateway MHP is questionable. Your mobile home and RV park was actually due for a sanitary survey in 2012, but failed to reply to the Missoula County inspector's requests. Greg Butts (DEQ, Kalispell) sent a letter on 12/10/2013 requesting a reply to set up the required sanitary survey inspection and received no reply (letter attached). I made multiple phone calls and left several voice messages in 2013 before receiving a voice message from you requesting a sanitary survey at 8 am on 9/24/2013. I called back and left a message confirming the date and time of inspection. I then called the day before the planned inspection and left a voice message to remind you that I'd be there the following morning. I was at Bitterroot Gateway Mobile Home Park in Lolo at 7:55 am on 9/24/2013 and was greeted by your son, Bo. He told me you couldn't make it, but he had opened up both pump houses at

your request for me to complete the scheduled inspection. Bo then left for work and I reluctantly completed the inspection with no representative on site.

- The State database shows Bitterroot Gateway MHP has 30 residential mobile home lots and 23 transient RV slips. The RV park had 18 active service connections at the time of this inspection and all the units appear to have been there for years. I noted wood piles, sheds, broken down vehicles, skirting, equipment, trailers and an accumulation of other various items that are common to a primary residence. Your RV park manager (Karen) and maintenance man (Ronnie) are two of these active residential connections. The data base will be corrected to reflect this change of use. The data base will now show there are 48 residential connections and 5 transient connections on the Bitterroot Gateway MHP system. It appears most of the service connections in the RV section of the park only serve one or two customers so I multiplied the 18 newly designated residential connections by 1.5. This brings your total residential population to 96 and changes the transient population to 10. Please feel free to call me at 406-755-8971 if you feel this change is unwarranted.
- The RV park appears to have been constructed in the 1960's and pre-dates the sanitation act of 1973. I assume this means the RV park doesn't have a COSA. With that said, I recommend you contact Barbara Kingery at 406-444-5368 to make sure additional subdivision review isn't required.

OPERATOR COMPLIANCE WITH STATE REQUIREMENTS:

You are listed as the owner, administrative contact, financial contact and certified operator (#4997) for the Bitterroot Gateway Mobile Home Park system within the State data base.

- Community public water supply systems that serve unchlorinated groundwater serving between 100 and 2,500 people must have a class 4AB certified operator. DEQ PWS records show your system serves over 100 people and you only a class 5AB certification. Please contact Reta Therriault (444-3434) or Julie Allen (444-4584) to update your certification level.
- The June 2009 sanitary survey completed by Ken Anderson of Missoula County stated "In your occasional absence the monthly sampling has been completed by your son with instructions you have provided." This is not acceptable because all bacteriological and chemical sampling for community public water systems must be completed by a certified water operator.
- I highly recommend you have a second certified water operator available to be in responsible charge while you're away from the system.

WASTERWATER

I could not confirm the exact locations of the mobile home park and RV park wastewater components at the time of this inspection because you were unable to attend the inspection. However, I did not observe wastewater components that appeared to threaten either source well at the time of this inspection.

- The change of 18 RV slips from transient to residential use may affect your current Missoula County wastewater permit.

Significant Deficiencies and Immediate Action Required:

Significant deficiencies may include, but are not limited to, defects in design, operation, or maintenance or a failure or malfunction of the sources, treatment, storage, or distribution system that the State determines to be causing or has the potential for causing the introduction of contamination into the water delivered to consumers.

The state of Montana adopted the federal Ground Water Rule (ARM 17.38.211) effective December 1, 2009. The Ground Water Rule establishes strict time lines for the identification of significant deficiencies, DEQ notification of the PWS system owner of the significant deficiency and the implementation of corrective action by the PWS.

The Department has established a Significant Deficiency Review Committee (Committee) to review deficiencies identified during a sanitary survey inspection or site visit to determine if they meet the Department's interpretation of significant. During this inspection, the following deficiency was identified and the DEQ Committee has determined that it meets the definition of significant:

- 1. Cross connection with inadequate backflow protection between the potable water system and buried irrigation system at the mobile home park pump house.**
- 2. Cross connection with inadequate backflow protection between the potable water system and buried irrigation system in the RV park valve vault.**

The Bitterroot Gateway Mobile Home Park PWS will be receiving separate correspondence from Elizabeth Henrikson, DEQ Ground Water Rule Manager, that will outline regulatory requirements and time lines for correcting this significant deficiency. Upon receipt of this letter, it is recommended that you immediately contact Mrs. Henrikson (444-2691).

If you have any questions about this report or public water supply regulations please give me a call at 406-755-8971.

Sincerely,

Mike Kropp
Environmental Science Specialist
DEQ PWS Kalispell
Phone: 406-755-8971
Email: mkropp@mt.gov
Fax: 406-755-8977

CC: Helena PWS file
Barbara Kingery
Kalispell PWS file
Missoula County

Bitterroot Gateway Mobile Home Park
C/o Terry Burkholder
PO Box 1292
Lolo, MT 59847

December 10, 2012

Re: Request to schedule Sanitary Survey Inspection at Bitterroot Gateway Mobile Home Park (PWSID # MT0000443).

Mr. Burkholder:

Sanitary Survey inspections are required for a community water system like Bitterroot Gateway MHP every three years by the Administrative Rules of Montana (ARM) 17.38.231. The last sanitary survey inspection for this water system was June 22, 2009. According to the cited rule 17.38.231 (2) "the supplier is responsible for ensuring the survey takes places" and "sanitary surveys must be performed by the department or an agent approved by the department".

Missoula City County Health Department Sanitarian, Erik Englebert, has attempted to set up an appointment with you to complete this survey, but you have not returned his calls. I have called your phone number 273-6034 several times in the past two weeks and left at least two messages about setting a time for the inspection, but you have not returned my phone call either. On November 27th I was in Lolo and attempted to talk with someone at the Mobile Home Park office but had no answer when I knocked on the door.

Today I am making a written request that you contact me to schedule the required sanitary survey inspection. I can be reached at (406) 755-8967 Monday – Friday between 8:30 am and 5:00 pm. I can also be reached on my cell phone just about any time and the number is (406) 260-3381.

This important inspection needs to be completed before the end of 2012, so there is not much time left to make an appointment. I am requesting a call as soon as you get this letter.

Thanks for your cooperation,

Gregory E. Butts

Field Services Section Supervisor
Public Water Supply Compliance Program
Department of Environmental Quality

Cc: Helena PWS File
Kalispell PWS file
Missoula City County Health Dept.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

2010 JAN 27 AM 10:31

IN THE MATTER OF:)	Docket No. SDWA-08-2010-0007
)	EPA REGION VIII
Bitterroot Gateway)	HEARING CLERK
MH and RV Park L.L.C.,)	
)	ADMINISTRATIVE ORDER
Respondent.)	

1. This Order is issued under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA) by the Safe Drinking Water Act, 42 U.S.C. § 300f *et seq.* (the Act), as properly delegated to the undersigned officials.

2. Bitterroot Gateway MH and RV Park L.L.C. (Respondent) is a limited liability corporation which owns and/or operates the Bitterroot Gateway Mobile Home Public Water System (the system), which provides piped water to the public in Missoula County, Montana, for human consumption.

3. The system is supplied by a groundwater source consisting of two wells.

4. The system has approximately 23 service connections serving approximately 67 individuals daily at least 60 days out of the year. The system also has approximately 29 service connections used by year-round residents and/or regularly serves at least 53 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 § 1401 of the Act, 42 U.S.C. § 300f.

5. Respondent is subject to the Act and the National Primary Drinking Water Regulations (drinking water regulations) at 40 C.F.R. part 141. The drinking water regulations are "applicable requirements" as defined in § 1414(i) of the Act, 42 U.S.C. § 300g-3(i).

6. The drinking water regulations include monitoring requirements. The Montana Department of Environmental Quality (MDEQ or the State) has sent Respondent annual notifications of the specific monitoring requirements that apply to the system.

7. The MDEQ has primary enforcement authority for the public water system supervision provisions of the Act in the State of Montana. EPA

issued a notice of the system's violations to the State on December 10, 2009. The State elected not to commence an enforcement action against Respondent for the violations listed in the notice of violation within the thirty-day time frame set forth in § 1414(a) of the Act, 42 U.S.C. § 300g-3(a). EPA has provided a copy of this Order to the State and has provided the State the opportunity to confer with EPA regarding this Order.

VIOLATIONS

8. Respondent is required to monitor the system's water at every entry point to the distribution system for combined radium for four consecutive quarters to comply with the initial monitoring requirements. 40 C.F.R. § 141.26(a). Respondent failed to monitor the system's water at both well #1 and well #2 for combined radium during the 1st, 2nd, 3rd, and 4th quarters of 2007; 2nd and 4th quarters of 2008; and the 1st and 3rd quarters of 2009; and at well #1 during the 4th quarter 2009; and at well #2 during the 2nd quarter of 2009 and, therefore, violated this requirement.

9. Respondent is required to monitor the system's water at every entry point to the distribution system for gross alpha for four consecutive quarters to comply with the initial monitoring requirements. 40 C.F.R. § 141.26(a). Respondent failed to monitor the system's water at both well #1 and well #2 for gross alpha during the 1st, 2nd, and 3rd quarters of 2007 and, therefore, violated this requirement.

10. Respondent is required to monitor the system's water annually at every entry point to the distribution system for nitrate. 40 C.F.R. § 141.23(d). Respondent failed to monitor the system's water at well #2 for nitrate during 2008 and, therefore, violated this requirement.

11. Respondent is required to monitor the system's water at every entry point to the distribution system for certain inorganic contaminants at least once during every 3-year compliance period. 40 C.F.R. § 141.23(a), (c). Respondent failed to monitor the system's water at well #1 for inorganic contaminants during the 2005 - 2007 compliance period and, therefore, violated this requirement.

12. Respondent is required to monitor the system's water at well #2 at least annually for volatile organic contaminants. 40 C.F.R. § 141.24(f)(5). Respondent failed to monitor the system's water at well #2 for volatile organic contaminants during 2005 and 2008, and, therefore, violated this requirement.

13. The law requires Respondent to notify the public of certain violations of the drinking water regulations, in the manner specified by the regulations. 40 C.F.R. § 141.201 *et seq.* Respondent failed to notify the public of the violations listed in paragraphs 8 through 12 above and, therefore, violated this requirement. Public notice for the 2009 failure to monitor combined radium violations in paragraph 8 is not yet overdue.

14. Respondent is required to report any failure to comply with any of the drinking water regulations (except where a different reporting period is specified in the drinking water regulations) to the State within 48 hours. 40 C.F.R. § 141.31(b). Respondent failed to report the violations listed in paragraphs 8 through 13 above to the State and, therefore, violated this requirement.

ORDER

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

15. Between January 1, 2010 and March 31, 2010, and for subsequent quarters until the State specifies in writing a different monitoring frequency, Respondent shall monitor the system's water for combined radium at each entry point to the distribution system as required by 40 C.F.R. § 141.26(a).

16. Respondent shall monitor the system's water for gross alpha at each entry point to the distribution system every 9 years as required by 40 C.F.R. § 141.26(a) and according to the State which allowed for reduced monitoring following the 4th quarter 2007 and 1st quarter 2008 gross alpha monitoring results which were below the detection limit. 40 C.F.R. §§ 141.26(a)(2)(iii) and 141.26(a)(3). Respondent's next gross alpha sampling is due between 2017 – 2025.

17. Respondent shall monitor the system's water at each entry point to the distribution system annually for nitrate. 40 C.F.R. § 141.23.

18. Respondent shall monitor the system's water for inorganic contaminants. 40 C.F.R. § 141.23(a), (c). Respondent sampled well #1 for inorganic contaminants on February 20, 2008. Respondent's next inorganic contaminant sampling is due for well #1 between 2011 – 2013. Respondent's next inorganic contaminant sampling is due for well #2 by the end of 2010.

19. Respondent shall monitor the system's water for volatile organic contaminants. 40 C.F.R. § 141.24. Within 30 days of receipt of this Order, Respondent shall monitor well #2 for volatile organic contaminants, and thereafter in compliance with 40 C.F.R. § 141.24. Respondent's next volatile organic contaminant sampling for well#1 is due by the end of 2010.

20. Within 30 days of receiving this Order, Respondent shall notify the public of the violations cited in paragraphs 8 through 12, above, as required by 40 C.F.R. part 141, subpart Q. Thereafter, following any future violation of the drinking water regulations, Respondent shall comply with the applicable public notice provisions of 40 C.F.R. part 141, subpart Q. Within 10 days of providing public notice, Respondent shall submit a copy of the notice to EPA and the State.

21. Respondent shall report any violation of the drinking water regulations to EPA and the State within 48 hours of discovery. 40 C.F.R. § 141.31(b).

22. Respondent shall report analytical results to EPA and the State within the first 10 days following the month in which each sample result is received, as required by 40 C.F.R. § 141.31(a).

23. Reporting requirements specified in this Order shall be provided by certified mail to:

Kimberly Pardue Welch
U. S. EPA Region 8 (8ENF-W) **AND**
1595 Wynkoop Street
Denver, CO 80202-1129
Pardue-Welch.Kimberly@epa.gov

Shelley Nolan
Montana Department of
Environmental Quality- PWSS
P.O. Box 200901
Helena, MT 59620-0901

GENERAL PROVISIONS

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

25. Violation of any part of this Order, the Act, or the drinking water regulations may subject Respondent to a civil penalty of up to \$37,500 (as adjusted for inflation) per day of violation, 42 U.S.C. § 300g-3(g)(3); 40 C.F.R. part 19.

Issued this 27th day of January, 2010.

David Rochlin

David Rochlin, Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Darcy O'Connor

Darcy O'Connor, Acting Director
Technical Water Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

2010 SEP 13 PM 12:52

FILED
EPA REGION VIII
HEARING CLERK

Ref: 8ENF-W

SEP 13 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Neal Cooley, Registered Agent
Bitterroot Gateway MH and RV Park, L.L.C.
5707 West Harrier Ave.
Missoula, MT 59801

Re: Violation of Administrative Order
Bitterroot Gateway Mobile Home
Park Public Water System
Docket No. SDWA-08-2010-0007
PWS ID # MT0000443

Dear Mr. Cooley:

On January 27, 2010, the US Environmental Protection Agency (EPA) issued an Administrative Order, Docket No. SDWA-08-2010-0007, ordering Bitterroot Gateway MH and RV Park, L.L.C. (Respondent), as owner of the Bitterroot Gateway Mobile Home Park public water system, to comply with various regulations issued by EPA under the Safe Drinking Water Act (SDWA), 42 U.S.C. section 300f et seq.

Our records indicate that Bitterroot Gateway MH and RV Park, L.L.C. is in violation of the Order. Among other things, the Order included the following requirements (quoted from items 15 and 21 of the "Order" section on pages 3 and 4 of the Order):

1. Between January 1, 2010 and March 31, 2010, and for subsequent quarters until the State specifies in writing a different monitoring frequency, Respondent shall monitor the system's water for combined radium at each entry point to the distribution system as required by 40 C.F.R. § 141.26(a).

Respondent monitored well #1 and well #2 for combined radium on January 27, 2010 and February 16, 2010, respectively. The Respondent, however, failed to monitor and report combined radium for both entry points

to the distribution system (both wells) during the 2nd quarter (April – June) of 2010.

2. Respondent shall report any violation of the drinking water regulations to EPA and the State within 48 hours of discovery. 40 C.F.R. § 141.31(b).

Respondent failed to report the above mentioned violation to EPA and the State within 48 hours of discovery.

EPA is considering additional enforcement action as a result of the non-compliance with the Order. Violating an Administrative Order may lead to (1) a penalty of up to \$37,500 per day per violation of the Order, and/or (2) a court injunction ordering compliance.

If you have any questions or wish to have an informal conference with EPA, you may contact Kimberly Pardue Welch at 1-800-227-8917, extension 6983 or (303) 312-6983. If you are represented by an attorney who has questions, please ask your attorney to contact Amy Swanson, Enforcement Attorney, at 1-800-227-8917, extension 6906 or (303) 312-6906 or at the following address:

Amy Swanson
Enforcement Attorney
U.S. EPA, Region 8 (8ENF-L)
1595 Wynkoop Street
Denver, Colorado 80202-1129

We urge your prompt attention to this matter.



Lisa Kahn, Team Leader
Drinking Water Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

cc:

Terry L. Burkholder, Bitterroot Gateway MHP (via certified mail w/
return receipt)
John Arrigo, MT DEQ
Shelley Nolan, MT DEQ
Tina Artemis, EPA Regional Hearing Clerk



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 W. 15th STREET, SUITE 3200
HELENA, MONTANA 59626

MAR 12 2014

2014 MAR 12 PM 2:41

PAID 2014 MAR 12
MONTANA OFFICE

Ref: 8MO

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Neal Cooley, Registered Agent
Bitterroot Gateway MH and RV Park, L.L.C.
5707 West Harrier Ave.
Missoula, MT 59801

Re: 2nd Administrative Order Violation
Bitterroot Gateway Mobile Home Park Public Water Supply
Docket No. SDWA-08-2010-0007
PWS ID #MT0000443

Dear Mr. Cooley:

On January 27, 2010, the U.S. Environmental Protection Agency (EPA) issued an Administrative Order (Order), ordering the Bitterroot Gateway MH and RV Park, L.L.C. (Respondent), to comply with certain regulations promulgated under the federal Safe Drinking Water Act, 42 U.S.C. §§ 300f to 300j-26. The EPA's records indicate that the Respondent is in violation of the Order. Among other things, the Order included the following requirement (quoted from item 19 on page 4 of the Order):

Respondent shall monitor the system's water for volatile organic contaminants (VOCs). 40 C.F.R. § 141.24. Within 30 days of receipt of this Order, Respondent shall monitor well #2 for VOCs, and thereafter in compliance with 40 C.F.R. § 141.24.

The Respondent failed to monitor the system's water for VOCs contaminants during 2011-2013 monitoring period. The System most recently collected its VOC sample on November 4, 2010. The next VOC sample shall be collected during the 2014 calendar year.

The EPA is considering additional enforcement action as a result of the Respondent's non-compliance with the Order. Violating an administrative order may lead to (1) a penalty of up to \$37,500 per day per violation of the order, and/or (2) a court injunction ordering compliance.

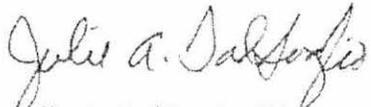
If the EPA's information appears incorrect and/or you have any questions, please contact Sienna Meredith at 1-800-457-2690 or (406) 457-5026. If you are represented by an attorney who has questions, please ask the attorney to contact Amy Swanson, Enforcement Attorney, at 1-800-227-8917, extension 6906, or (303) 312-6906, or at the following address:



Amy Swanson
Enforcement Attorney
U.S. EPA, Region 8 (8ENF-L)
1595 Wynkoop Street
Denver, Colorado 80202-1129

We urge your prompt attention to this matter.

Sincerely,



Julie A. DalSoglio, Director
EPA Region 8 Montana Office

cc: Terry L. Burkholder, Bitterroot Gateway MHP
Chad Anderson, MDEQ
Jon Dilliard, MDEQ
Tina Artemis, EPA Regional Hearing Clerk

Wendy Swanson



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1120
Phone 800-227-8917
<http://www.epa.gov/region08>

FILED
EPA REGION VIII
HEARING CLERK

2009 DEC 10 PM 12:12

Ref: 8ENF-W

DEC 10 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard Opper, Director
Montana Department of
Environmental Quality
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Re: NOTICE OF VIOLATION

Docket No. **SDWA-08-2010-0007**
Bitterroot Gateway
Mobile Home Park
10011 Hwy 93 S
Lolo, MT 59847
PWS ID# MT0000443

Dear Mr. Opper:

The public water supply system referenced above (the system) has violated certain provisions of the National Primary Drinking Water Regulations at 40 C.F.R. part 141 (the drinking water regulations), according to records that the United States Environmental Protection Agency (EPA) has obtained from the Montana Department of Environmental Quality and its Public Water Supply Online Query Reports.

EPA promulgated the drinking water regulations under the authority of the Safe Drinking Water Act (the Act), 42 U.S.C. § 300f *et seq.* EPA is issuing this notice of violation pursuant to section 1414(a) of the Act, 42 U.S.C. § 300g-3(a), which authorizes EPA to issue an administrative compliance order or file a lawsuit concerning the system if the State of Montana (the State) does not commence an appropriate enforcement action within thirty days of receiving this notice.

The violations are listed in the table below.

<u>Date of Violation</u>	<u>Violation</u>
1 st , 2 nd , 3 rd and 4 th quarters of 2007, 2 nd and 4 th quarters of 2008; and 1 st , 2 nd and 3 rd quarters of 2009	Failure to monitor for combined radium at wells #1 and #2. [40 C.F.R. § 141.26(a)(2)]
1 st , 2 nd , and 3 rd quarters of 2007	Failure to monitor for gross alpha at wells #1 and #2. [40 C.F.R. § 141.26(a)(2)]
2008	Failure to monitor for nitrate at well #2. [40 C.F.R. § 141.23(d)]
2005 - 2007	Failure to monitor for inorganic chemicals at well #1. [40 C.F.R. § 141.23(c)(1)]
2005 2008	Failure to monitor for volatile organic chemicals at well #2. [40 C.F.R. § 141.24(f)]
2006 - 2009	Failure to notify public of various above-referenced violations. [40 C.F.R. § 141.201]
2005 - 2009	Failure to report the above-referenced violations to the State. [40 C.F.R. § 141.31(b)]

EPA is also sending a copy of this notice of violation to the system. Also enclosed for the benefit of the system is a copy of EPA's Small Business Regulatory Enforcement and Fairness Act (SBREFA) fact sheet containing information on compliance assistance resources and tools available to small businesses and small governments, in case these resources apply to this situation. SBREFA does not eliminate the responsibility to comply with the drinking water regulations. By providing this information sheet, EPA has not necessarily determined that the system is in fact a "small entity" as that term is defined in SBREFA.

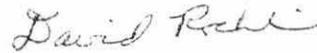
If the State does not commence an appropriate enforcement action concerning this system within 30 days from your receipt of the notification, EPA will likely issue an administrative order to the owner and/or operator of the system.

Please have your staff notify Kimberly Pardue Welch at (800) 227-8917, extension 6983 or (303) 312-6983, within 20 days if your records show any discrepancies with the violations cited above, if your staff learns of any change in the system's compliance status, or if there are any questions or comments. Thank you for your assistance.

Sincerely,



Darcy O'Connor, Acting Director
Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice



David Rochlin, Supervisory Attorney
Legal Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

Enclosures:

SBREFA fact sheet

cc: John Arrigo, MT DEQ (w/o enclosures)
Shelley Nolan, MT DEQ (w/o enclosures)
Terry L. Burkholder, Bitterroot Gateway Mobile Home Park
(via certified mail w/ return receipt)
Bitterroot Gateway MH and RV Park L.L.C. (via certified mail w/ return
receipt)
Tina Artemis, EPA Regional Hearing Clerk

bcc: Brenda Cazier, 8ENF-PT
Amy Swanson, 8ENF-L
Hannah Ross, 8ENF-L
Lisa Kahn, 8ENF-W
Julie DalSoglio, 8MOO
Reading File

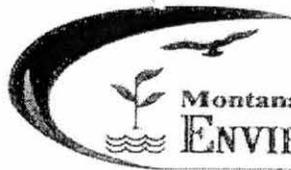
cc addresses:

John Arrigo, Administrator
Enforcement Division
Montana Department of
Environmental Quality
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Shelley Nolan, Rule Specialist Manager
Public Water Supply Compliance Section
Montana Department of
Environmental Quality
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901

Terry L. Burkholder, Owner/Operator (via certified mail w/ return receipt)
Bitterroot Gateway Mobile Home Park
P.O. Box 1292
Lolo, MT 59847

Paul Neal Cooley, Registered Agent (via certified mail w/ return receipt)
Bitterroot Gateway MH and RV Park L.L.C.
5707 West Harrier Ave.
Missoula, MT 59801



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor
Richard H. Opper, Director

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.mt.gov

February 4, 2010

BURKHOLDER TERRY
BITTERROOT GATEWAY MB PK LOLO
BOX 1292
LOLO MT 59847

**Re: Monitoring Report and Schedule for BITTERROOT GATEWAY MB PK LOLO,
PWSID#:MT0000443, Class: (C)**

A new chemical monitoring schedule has been prepared for your system and is enclosed. If you are a new Public Water supply you are required to sample within the first three months of startup, in accordance to Administrative Rules of Montana (ARM) 17.38.216. If you recently added or changed the inventory for your existing system, this schedule supersedes any previous schedules that have been issued. We hope that you will find this schedule helpful. Please be aware that all of the samples must be taken within the timeframes provided in this schedule; otherwise, the schedule will be inaccurate. Further, if samples are not taken at the required times, or the levels exceed any of the Public Water Supply rules, you may be required to conduct additional sampling, or change timelines set forth in the current schedule.

Please contact the certified laboratory of your choice to receive sample bottles and sampling procedures. The laboratory may also be able to answer any questions that you have regarding sampling, but it is recommended that you always contact us as well, since we are the regulatory governing body.

If you have any questions regarding your specific public water supply monitoring requirements, please feel free to call one of the following telephone numbers for assistance:

Laura Andersen	Total Coliform & Nitrate Rule Manager	444-5314
Ed Kiely	Phase 2/5 Rule/Radiological Rule Manager	444-3967
Vacant	Lead and Copper Rule Manager	444-4400
John Jose	Disinfectant/Disinfection By Product Rule Manager & Ground Water Chlorine Rule Manager	444-5312
Vacant	Surface Water Treatment	444-4400
Betsy Hovda	Groundwater Rule	444-2691

Do not forget our Internet website that allows you to see your sample results and schedules at www.deq.mt.gov/wqinfo/pws/reports.mcpix.



Public Water Supply System Monitoring Report

Contact Public Water Supply Section staff at (406) 444-4400.

Schedule Effective Date 1/21/2010

Class	Source	Served	Ann Op Period	PWS ID	System Name	County Served	City Served
C	GW	122	01/01-12/31	MT0000443	BITTERROOT GATEWAY MB PK LOLO	MISSOULA	LOLO

Active System Facilities with an Active Sampling Point

Water System Facility ID and Name	Water Type	Sampling/Entry Point ID/Description
DS001 DISTRIBUTION SYSTEM	GW	SP001 SP FOR DS
WL002 WELL 1	GW	EP502 EP FOR WELL 1
WL003 WELL 2	GW	EP503 EP FOR WELL 2

Sampling Schedules and Requirements

Fac ID	SP ID	Collection Period	Requirements	Code	Group Name	Last Collected
DS001	SP001	1/1 - 12/31	1 Routine Sample Monthly	3100	COLIFORM TOTAL (TCR)	12/17/2009

Phase 2/5 Chemical Rule

FacID	EP ID	Requirements	Group Name	Last Collected	Due
WL002	EP502	1 RT every 3 YR	ARSE ARSENIC	10/11/2009	Due3Y
WL002	EP502	1 RT every 3 YR	INO1 P2-S INORGANICS	2/20/2008	
WL002	EP502	1 RT every YR	NITR NITRATE NITRITE	5/27/2009	DueYR
WL002	EP502	1 RT every 3 YR	SOC1 SOC	11/14/2007	Due3Y
WL002	EP502	1 RT every 3 YR	VOC1 VOC	11/27/2007	Due3Y
WL003	EP503	1 RT every 3 YR	ARSE ARSENIC	10/16/2008	Due3Y
WL003	EP503	1 RT every 3 YR	INO1 P2-S INORGANICS	10/16/2008	Due3Y
WL003	EP503	1 RT every YR	NITR NITRATE NITRITE	5/27/2009	DueYR
WL003	EP503	1 RT every 3 YR	SOC1 SOC	12/26/2007	Due3Y
WL003	EP503	1 RT every 3 YR	VOC1 VOC	11/27/2007	Due3Y

Radionuclide Rule

FacID	EP ID	Requirements	Group Name	Last Collected	Due
WL002	EP502	1 RT every QT	COMB RADIUMS COMBINED	5/27/2009	DueQT
WL002	EP502	1 RT every 9 YR	GRAL RAD GROSS ALPHA	5/27/2009	
WL003	EP503	1 RT every QT	COMB RADIUMS COMBINED	11/9/2009	DueQT
WL003	EP503	1 RT every 9 YR	GRAL RAD GROSS ALPHA	2/20/2008	

Lead and Copper Rule

FacID	Requirements	Collection Period	Group	Last Sample Summary
DS001	5 RT every 3Y	6/1-9/30	PBCU	9/28/2007

Information

ACRONYMS

- PWS Class: C community, NTNC non-transient non-community, NC non-community (transient)
- Facility: CH common header, CW clear well, DS distribution, IN intake, PC pressure control, PF pump facility, RS reservoir, SP spring, ST storage facility, TP treatment, WL well
- Water Types: GW ground water, SW surface water, GU ground water under the direct influence of surface water
- Sampling/Entry Point: SP sample point for distribution, EP entry point for another facility type

Sample at each entry point to the distribution system using the entry point labels that have been provided by DEQ. Microbiological, asbestos, disinfection byproducts, and lead & copper samples are to be taken from within the distribution system.

This report lists monitoring requirements by rule, facility, sample/entry point and analyte group. These requirements specify the number of samples to be taken within the specified monitoring period. The Standardized Monitoring Framework is illustrated below. Sample due information is provided for Phase 2/5, Radionuclide, Water Quality Parameter & Orthophosphate schedules. DUE printed next to a sample schedule means a sample is due during the current monitoring period. For example, if you have a Ph 2/5 Chemical schedule of 1 sample every three years and your last collected sample was in 2007, "DUE 3Y" is noted and you are required to sample within the current 2008-2010 three-year compliance period. Some rules require sampling at specified intervals for certain analytes (Disinfection By Products and Lead & Copper rules) rather than within a standard monitoring period. Please consult the notes below for your PWS system class, the DEQ PWS web site (<http://deq.mt.gov/wqinfo/pws/>) or contact a PWS rule specialist by calling 406-444-4400 for more information.

Monitoring Timeframes for PWS Sampling Schedules												
9-year CYCLE Jan 2002 - Dec 2010												
3-year period 2002-2004			3-year period 2005-2007			3-year period 2008-2010			3-year period 2011-2013			
2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1-year period Jan - Dec												

COMMUNITY HELPFUL NOTES

ENTRY POINT

- Contact a certified lab for nitrate sample bottles adequate for your monitoring requirement.
- Inorganic chemicals (IOCs) are grouped as phase 2 and phase 5 (INO1) or separately as P2 for phase 2 (INO4) and P5 for phase 5 (INO2). Arsenic has its own schedule and is generally not included in phase 2 & 5. Phase 2 inorganic analytes include barium, cadmium, chromium, fluoride, mercury and selenium. Phase 5 inorganic analytes include antimony, beryllium, nickel and thallium.
- Synthetic organic chemicals (SOCs) are analyzed by different EPA analytical methods. Detects of regulated contaminants will trigger increased monitoring requirements.
- Volatile organic chemicals (VOCs) are analyzed by an EPA analytical method. Detects of regulated VOCs will trigger increased monitoring requirements. No detect of VOCs during baseline monitoring & three years of annual samples will decrease frequency to once every three years for groundwater systems. Surface water systems sample annually.
- Radiological contaminants are to be monitored on varying timelines. The frequency is based on contaminant levels.
- Compositing samples may lower sampling costs and is allowable for VOCs, SOCs herbicides and carbamates. It is also allowed for radiologicals for up to 4 consecutive quarterly samples if analysis is completed within 1 year of the first sample. Contact your lab about composite sample protocol.
- Subpart H systems (Surface Water & GWUDI/SW) have sampling requirements for Total Organic Carbon and Alkalinity from the source, and for TOC finished. Specific requirements vary based on system type and sample result history.

DISTRIBUTION

- Contact a certified lab and set up a schedule to receive back sample bottles. Submit samples early in the month to allow time for resample if you have an unsatisfactory back result. It is good practice to have at least 10 extra bottles on hand for repeat and temporary routine (follow-up) samples. In the event of an unsatisfactory back result, repeat samples must be taken within 24 hours of being notified by the lab, and temporary routine samples must be collected in the month following, even if all the repeat samples were satisfactory. Every system is required to submit a written sampling plan to the department.
- Contact your lab and ask for a lead & copper sample kit early in the monitoring period. For systems monitoring for lead and copper annually, triennially, or once every 9 years, sampling must be conducted between June 1st and September 30th. Triennial sampling must be collected no later than every third calendar year. Nine year sampling must be collected no later than every ninth calendar year. Be sure to collect the required number of analyte samples. Don't forget to complete the lead consumer notice within 30 days after you receive your lead and copper results. Forms and information can be found online at <http://www.deq.mt.gov/wqinfo/pws/leadcopper.asp>.
- Disinfection byproduct sampling includes monitoring for both THMs and HAAs within the distribution system. Those on annual or three year schedules must sample between July 1 and September 30th. Reduced monitoring is based on sample results, type of source water, and population. Those on 3 year schedules are required to sample within the seasonal collection period every third calendar year. Systems disinfecting by Ozone must sample for Bromate of finished product.
- An asbestos sample collected from the distribution is required for systems during the first three-year period of a new nine-year compliance cycle.

WAIVERS

- A phase 2 & 5 waiver, which reduces the monitoring frequency for most of the inorganics to once every nine-year compliance cycle, can be applied for in writing to the department after three rounds of monitoring.
- Organic waivers are also available for reduced monitoring frequency based on sampling history and submittal of a current use and/or susceptibility inventory update to the department.
- Waivers become effective upon written approval by the Department.

INCREASED MONITORING

- This schedule will no longer be applicable if the Department requires increased monitoring for any reason.