



CERTIFIED MAIL

January 23, 2025

TOWN OF SACO
ERNEST J. MARINKO
PO BOX 330
SACO MT 59261

RE: Ground Water Rule: Significant Deficiency Determination Notification,
Town Of Saco, PWSID: MT0000323

Dear Ernest J. Marinko,

On January 9, 2025, a conference call was held between MT DEQ personnel and personnel from the Town of Saco public water supply to discuss the system's inability to maintain the minimum disinfection level within the distribution system. The phone call outlined potential issues regarding the presence of iron bacteria in the distribution system piping and elevated levels of manganese in your system's sources. During the conversation it was discussed that the inability to maintain the minimum disinfection treatment level in the distribution system was a potential significant deficiency. Following our conversation, the potential significant deficiency was submitted to the Significant Deficiency Review Committee (SDRC) for determination. The Administrative Rules of Montana (ARM) 17.38.211, Ground Water Rule, requires public water supplies to address significant deficiencies. Significant deficiencies have the potential to adversely affect public health and must be corrected to remove that threat.

The issue referred to the SDRC:

Item 1:

System is unable to maintain minimum disinfection level within the distribution system. The system's sources have elevated Mn levels. Mn treatment is sequestration with polyphosphate. Due to the use of polyphosphate the system is required to maintain a minimum chlorine residual of 0.20mg/L in all parts of the distribution system. Until August of 2024, the system was monitoring chlorine residuals incorrectly. Since then, the system has received several violations for failing to maintain the minimum disinfection level within the distribution system. In November 2024, Montana Rural Water System's collected samples in the distribution system that confirmed the presence of iron bacteria and heterotrophic bacteria. The combination of elevated Mn and the biofilm within the distribution system piping has created a substantial demand on chlorine. The system is currently observing an entry point chlorine residual of 4-8.8mg/L and observing 0.1-0.08mg/L in the DS.

The SDRC has determined that this item is a significant deficiency.

The SDRC recommends that:

Item 1:

System is required to maintain their daily chlorine residual as determined by the DEQ. The treatment plant and its operation may need to be revisited or redesigned with approval from the DEQ to address the issues.

To assist in possible interim and long-term solutions, please contact Jason Fladland with the Capacity Development program at DEQ. Jason would like to schedule a technical assistance visit to better understand the current situation.

*Jason Fladland
(406)444-6861
Jason.Fladland@mt.gov*

The Ground Water Rule requires:

1. That you respond to Dillon Johnson DEQ, in writing, within 30 days (by February 22, 2025) of receiving this letter and indicate:
 - The corrective action(s) the system plans to complete, and
 - The schedule you will use to address this significant deficiency,
2. That you either complete the corrective actions within 120 days (by May 23, 2025) or be on an approved corrective action plan, and
3. That documentation and images of the completed work are submitted to Dillon Johnson once the repairs are complete.

Failure to meet these requirements may result in a violation. Please note that a system may not construct, alter, extend, or operate prior to written approval by DEQ's Engineering Bureau.

If you have any questions, please contact me. Thank you for your prompt attention to this matter.

Sincerely,



Dillon Johnson
Ground Water Rule Manager
Montana Department of Environmental Quality
Public Water Supply Bureau
(406) 444 - 4633 | dillon.johnson@mt.gov

Cc: PWS file
BILLINGS OFFICE
Phillips County Sanitarian
Ernest J. Marinko – Email Complete
Matthew Mudd, Great West Engineering – Email Complete
Karl Carlson, MT DEQ -Email Complete
Gretchen Westhoff MT DEQ – Email Complete
Jason Fladland MT DEQ – Email Complete