

See what's possible.



February 27, 2025

Dillon Johnson
Groundwater Rule Manager
MT Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

Re: Town of Saco Ground Water Rule: Significant Deficiency Determination Response (PWSID: MT0000323)

Dear Mr. Johnson:

On behalf of the Town of Saco and as the City's engineer of record, this letter is intended to provide a response and proposed plan related to the Significant Deficiency Determination letter dated January 23, 2025. The significant deficiency is related to the Town's difficulty in maintaining the minimum disinfection level in the distribution system, as well as issues related to the presence of iron bacteria, heterotrophic bacteria, and elevated levels of manganese. According to the letter, a response is required to be submitted to DEQ no later than February 22, 2025, showing the plan and schedule to correct the deficiencies. A subsequent follow-up email to Dillon Johnson confirmed that an extension to provide a response was granted for February 28th in order to incorporate findings from the DEQ Capacity Development program technical assistance site visit completed during the week of February 17th, 2025.

The Town of Saco understands that improvements to the water treatment and distribution system can be costly. Therefore, the Town proposes to complete water system evaluations and upgrades in a phased approach while pursuing funding opportunities to address the more costly remedies as identified. The initial phases would focus on lower-cost approaches, assessments, pilot-scale testing, and operational modifications, with the subsequent phases of work requiring additional time and funding to implement. The need for the subsequent phases of work will be verified as each task is completed and if the significant deficiency can be addressed with the initial lower-cost alternatives.

In summary, the Town of Saco proposes the following phases of work to address the deficiency:

- **Initial Phase**—Complete testing and troubleshooting on the existing system. The Town will work with DEQ Capacity Development technical assistance, Great West Engineering, and other resources to evaluate low-cost installations, operational modifications, and recommendations. The Town will prepare a memorandum of findings from the initial phase, which will inform the interim engineering evaluation phase.
- **Interim Phase**—Perform an engineering alternatives analysis, including evaluating potential improvements and measures recommended to address the chlorine, bacteria, and manganese issues. The town will work with the engineer to prepare

HELENA

2501 Belt View Drive
Helena, MT 59601
Ph: (406) 449-8627
F: (406) 449-8631

BILLINGS

6780 Trade Center Avenue
Billings, MT 59101
Ph: (406) 652-5000
F: (406) 248-1363

BOISE

1921 F Overland Road
Meridian, ID 83642
Ph: (208) 576-6646

GREAT FALLS

702 2nd Street Ste #2
Great Falls, MT 59405
Ph: (406) 952-1109

SPOKANE

10220 N Nevada Street
Suite 130
Spokane, WA 99218
Ph: (509) 413-1430



an alternative analysis report that evaluates the potential improvements, associated costs, and funding options for potential upgrades.

- Pilot Testing Phase—Based on the findings of the alternatives evaluation, the Town will work with the engineer to perform pilot-scale testing of potential water treatment system upgrades.
- Treatment system upgrades – Perform design services followed by the construction of water treatment system upgrades for the preferred alternative.
- PER Phase – Complete a PER to evaluate the entire water system and evaluate long-term water system improvements. The PER funding will be applied for as planning grant funds become available. The milestones for completion of the PER and subsequent construction grant applications are not shown on the milestone schedule, given the significant deficiency, which is assumed to be addressed using the more readily available EC or SRF funds to expedite the completion of the treatment project.

Below is a schedule with estimated milestone completion dates. The milestone dates may change as the phases of work progress and as funding becomes available. If applicable, DEQ will be notified in advance of any potential schedule changes. The Town will apply for Emerging Contaminant (EC) funding to assist in funding engineering and construction of treatment system upgrades. State planning grants will be considered to fund the PER to identify longer-term water system upgrades.


Plan and Schedule Task	Completion Date
Apply for EC and/or SRF Funding	April 30, 2025
Initial Phase – Water System Testing and Troubleshooting, Memo of Findings	June 30, 2025
Award EC or SRF Funding	July 1, 2025
Contract for Engineering Services	July 15, 2025
Interim Phase – Perform an Engineering Alternatives Analysis and Report	September 30, 2025
Pilot Testing Phase – Onsite Pilot Scale Testing and Summary Report	December 30, 2025
Treatment System Upgrades – Preliminary/Final Design, DEQ Approval	April 30, 2026
Bid Treatment Project	May 30, 2026
Notice to Proceed of Treatment Project Construction	June 30, 2026
Treatment Project Final Completion	September 30, 2026



The Town of Saco and Great West will continue to update DEQ on the project's progress and the Town is committed to implementing a reliable, long-term treatment solution.

If you have any questions, please contact me at 406-495-6196.

Sincerely,
Great West Engineering, Inc.


Matthew Mudd, PE
Project Manager


Town of Saco Concurrence:

Electronic Cc: Town of Saco
Karl Carson, DEQ
Jason Fladland, DEQ