



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region08](http://www.epa.gov/region08)

Ref: 8 Montana

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Denny Larson  
Wild Horse Hot Springs  
P.O. Box 629  
Hot Springs, Montana 59845

Re: Inspection Report for Wild Horse Hot Springs (MTU000713)

Dear Mr. Larson:

On June 13, 2022, representatives of the U.S. Environmental Protection Agency and Confederated Salish & Kootenai Tribes inspected the Wild Horse Hot Springs wastewater lagoon in Hot Springs, Montana, to evaluate compliance with the Clean Water Act and EPA regulations. The inspection was conducted under the authority of Section 308 of the Clean Water Act (Act). Enclosed is a report of the inspection.

Inspection findings are summarized within the enclosed inspection report in a table titled "Findings, Corrective Actions and Recommendations." Within **thirty (30) days** of receipt of this report, please provide the EPA with a summary of corrective actions taken to address each of the findings identified in the report and any information that may change the findings or content of the report. This summary should be sent to:

Lisa-kay Prideaux  
EPA Region 8  
[Prideaux.Lisakay@epa.gov](mailto:Prideaux.Lisakay@epa.gov)

Wilhelmina Keenan  
CSKT Environmental Director  
[Willie.keenan@CSKT.org](mailto:Willie.keenan@CSKT.org)

Please contact me at 406-457-2055 or [Prideaux.lisakay@epa.gov](mailto:Prideaux.lisakay@epa.gov) if you have any questions regarding this letter or the enclosed report.

Sincerely,  
**Prideaux,**  
**LisaKay**

Lisa-kay Prideaux  
NPDES and Wetlands Enforcement Section  
Enforcement and Compliance Assurance Division

 Digitally signed by Prideaux,  
LisaKay  
Date: 2022.07.29 10:38:03 -06'00'

Enclosures:

- 1) NPDES Inspection Report
- 2) Photo Log

cc (electronic):

The Honorable Tom McDonald, Chairman, CSKT (email)

Wilhelmina Keenan, Environmental Director, CSKT (email)

Evan Smith, Water Quality Regulatory Specialist, CSKT (email)

## NPDES Inspection Report

| National Database Information                                                                |                                                   |
|----------------------------------------------------------------------------------------------|---------------------------------------------------|
| Inspection Date: <b>June 13, 2022</b>                                                        | Inspection Type: <b>Reconnaissance Inspection</b> |
| Entry/Exit Time: <b>09:02 / 09:34</b>                                                        | NPDES ID Number: <b>MTU000713</b>                 |
| NAICS Code: <b>713990 – All other Amusement &amp; Recreation Industries</b>                  | Inspection ID: <b>201906_MTU000713</b>            |
| Lead inspector and affiliation: <b>Lisa-kay Prideaux, U.S. EPA Montana Operations Office</b> |                                                   |
| Inspector and affiliation:                                                                   |                                                   |
| Inspector and affiliation:                                                                   |                                                   |

| Facility Location Information                                                                                                                                                          |                                                                                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Site/Facility Name & Location:<br><b>Wild Horse Hot Springs</b><br><b>175 Camp Aqua Road, Hot Springs, Montana</b><br><b>Flathead Reservation</b><br><b>47.640435°N; -114.572539°W</b> | Mail Report to:<br><b>Dennis Larson</b><br><b>P.O. Box 629</b><br><b>Hot Springs, MT 59845</b> |

| Contact Information                          |                                                                                                             |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------|
|                                              | Name(s)/Title                                                                                               |
| Facility Contacts:                           | <b>Dennis Larson, Wild Horse Hot Springs, owner (not present)</b>                                           |
|                                              | <b>Vicky Tuer, Wild Horse Hot Springs, desk clerk (present)</b>                                             |
|                                              |                                                                                                             |
|                                              |                                                                                                             |
| Person/Company meeting definition of "Owner" | <b>Dennis Larson, Owner, Wild Horse Hot Springs</b>                                                         |
| Authorized Official(s)                       | <b>Dennis Larson, Owner, Wild Horse Hot Springs</b>                                                         |
| Tribe Representative(s)                      | <b>Evan Smith, Water Quality Regulatory Specialist, Confederated Salish &amp; Kootenai Tribes (present)</b> |
| Indian Health Service Representative(s)      | <b>None present</b>                                                                                         |
|                                              |                                                                                                             |

| Permit Information                                                                |                                       |                                                         |
|-----------------------------------------------------------------------------------|---------------------------------------|---------------------------------------------------------|
| Is the permit on site and available? <b>N/A</b>                                   | Lagoon Category: <b>N/A</b>           | Monitoring Frequency: <b>N/A</b>                        |
| Effective Date: <b>Unpermitted</b>                                                | Expiration Date: <b>Unpermitted</b>   | Is the Facility under a compliance schedule? <b>N/A</b> |
| Is correct contact information indicated on ICIS?                                 | Indicate correct contact information: |                                                         |
| Receiving Water(s): <b>Wetland complex to the Little Bitterroot River</b>         |                                       |                                                         |
| Discharge point location (longitude, latitude): <b>47.640435°N; -114.572539°W</b> |                                       |                                                         |

Regulatory Inspector's source of information:  
**Aerial imagery, EPA records, facility personnel, and site review.**

### Areas Evaluated During Inspection

|                                 |                                  |                                                           |
|---------------------------------|----------------------------------|-----------------------------------------------------------|
| <u>Permit</u>                   | <u>Effluent/Receiving Waters</u> | <u>Compliance Schedule</u>                                |
| <u>Records/Reports</u>          | <u>Flow Measurement</u>          | <u>Discharge Monitoring Reports</u>                       |
| <u>Facility Site Review</u>     | <u>Monitoring Program</u>        | <u>Lift Station Operation and Maintenance</u>             |
| <u>Collection System Review</u> | <u>Lagoon Self- Inspections</u>  | <u>Preventive and Emergency Operation and Maintenance</u> |

### Report Review and Signature

| Drafter Signature/Name                                                                            | Address/Phone Number                                                                                              | Date              |
|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------|
|                                                                                                   | <b>U.S. EPA Region 8, Montana Operations Office<br/>10 West 15th Street, Suite 3200<br/>Helena, Montana 59626</b> | <b>07.26.2022</b> |
| <b><i>Lisa-kay Prideaux</i></b>                                                                   | <b>406-457-5022</b>                                                                                               |                   |
| Management Signature/Name                                                                         | Address/Phone Number                                                                                              | Date              |
| <b>Boeglin, Michael</b> Digitally signed by Boeglin, Michael<br>Date: 2022.07.29 08:32:33 -06'00' | <b>U.S. EPA Region 8<br/>1595 Wynkoop Street<br/>8ENF-W-NW<br/>Denver, Colorado 80202</b>                         | <b>07.29.2022</b> |
| <b><i>Michael Boeglin</i></b>                                                                     | <b>303-312-6250</b>                                                                                               |                   |

## Inspection Narrative and Site Description

On Monday, June 13, 2022, U.S. Environmental Protection Agency (EPA) inspector Lisa-kay Prideaux, and the Water Quality Regulatory Specialist for the Confederated Salish Kootenai Tribes, Evan Smith, conducted an unannounced inspection to evaluate compliance with the Clean Water Act and EPA regulations. The inspection commenced at approximately 09:00, when Lisa-kay and Evan arrived at the facility, presented credentials and identification, and asked to meet with the owner. Vicky Tuer, Wild Horse Hot Springs desk clerk stated that Mr. Dennis Larson was the owner and that he was not on-site at the time. EPA asked if we could have her answer some questions and show us around the site. Ms. Tuer called Mr. Larson to receive permission to assist us in our inspection. Throughout the inspection, observations and photograph descriptions were documented. All photographs taken during the inspection are included in the attached photo log.

The Wild Horse Hot Springs (facility) is a 10-acre site with on-site cabins, RV spots, public restrooms/changing rooms, and 14 hot pools. Water for the pools is provided by 3 on-site wells flowing at approximately 1,200 gallons per minute. All water from the wells is conveyed to the pools, public restrooms, and outdoor showers only. No water or sewer is provided to the on-site cabins or RV pads. Sewer from the public restrooms goes to an on-site septic and leach field system.

The hot pools range in size and temperature; the hot well water is approximately 120°C, with the cooler water coming in at approximately 90°C. Each pool receives water from the well, or combination of wells through a pipe(s) (photo 509), then flows out through an overflow pipe (photo 509); there is no chemical treatment of the water. The mineral type and content naturally occurring in the water is the attraction for the facility. The overflow water from the pools enters into a piping system which discharges to a ditch entering a large wetland complex (photo 510). Overflow water from the wells (water not used in the pools) is also discharged through the same ditch into the wetland complex (photo 511). The wetland complex is connected to the Little Bitterroot River to the east of the facility. At the time of the inspection, some of the pools were being cleaned. The process for cleaning was explained as draining the pool by taking the pool overflow pipe riser off, the pool is power washed with a hose and brushed down then the riser is replaced so the pool fills again. No chemicals are used during the cleaning process. Half of the pools are cleaned each day.

During the closing conference, Ms. Tuer provided a brochure with a list of the minerals (photo 508). I explained a report of the inspection and photo documentation would be mailed to Mr. Larson.

## Findings, Corrective Actions and Recommendations

### Finding #1:

The Wild Horse Hot Springs is discharging without a permit. Specifically, the facility has an established point source which discharges pollutants into navigable waters.

### Clean Water Act Requirements:

- The Clean Water Act states it is unlawful to discharge any pollutant from a point source into navigable waters, unless a permit is obtained.
- Section 502 of the Clean Water Act defines the term “point source” as any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged.

- Section 502 of the Clean Water Act defines the term “discharge of a pollutant” as any addition of any pollutant to navigable waters from any point source.
- Section 502 of the Clean Water Act defines the term “pollutant” as dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water.

**Discharge Location:**

- The point source discharge is located at 47.640411°N; -114.572531°W
- The facility discharges into a wetland complex which is directly connected to the Little Bitterroot River, which connects to the Flathead River.

**Corrective Action:**

Within 30 days of receipt of this report, Wild Horse Hot Springs is required to submit an application for coverage under the National Pollutant Elimination Discharge System (NPDES) permit program.