



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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**APR 19 2016**

CERTIFIED MAIL # 7009 3410 0001 9189 3454  
RETURN RECEIPT REQUESTED

Mr. Hollis H. Brower, Jr.  
P.O. Box 1080  
Nixa, MO 65714

RE: Notice of Revocation

Dear Mr. Brower:

This letter and enclosed Order serve as notification that the Drinking Water Treatment level "A" and Drinking Water Distribution level "III" Certificates of Competency issued to you under number 1822 from the Missouri Department of Natural Resources are revoked effective the date of this letter.

Missouri state regulation requires that any revoked certificates must be returned to the department. Accordingly, you must return your Drinking Water Treatment level "A" and Drinking Water Distribution level "III" to the department within 15 days of receipt of this letter. Return certificates or a written explanation why you are unable to do so to the Missouri Department of Natural Resources, Operator Certification Section, 1101 Riverside Drive, P.O. Box 176, Jefferson City, MO 65102. It is recommended that you use one of the following methods:

- Hand delivery
- Certified mail with return receipt
- Registered mail

As a result of the revocation, you are prohibited from operating drinking water systems either directly or by order. No individual shall make water system process control/system integrity decisions or perform any duties requiring certification while their certificate is revoked. To do so would be a violation of 10 CSR 60-14.020(7)(K).

Please note that any person wishing to become recertified after revocation of a certificate may do so only by reexamination. Applications for examination to become recertified may not be filed until one (1) year has elapsed following the date of revocation. Acceptance of any application for reexamination shall be at the discretion of the department.

Department records have identified 31 water systems that have listed you as their certified operator. Seven of these water systems list you as the administrative contact and operator. You may no longer serve as the operator of these systems following this revocation. Within 60 days of the effective date, submit the name, certificate number, and contact information to the department of the designated chief operator for the following water systems:

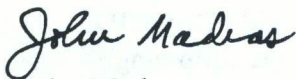
MO5031128 Blue Water Village/Blakewood Subdivision  
MO5031152 Valley Woods Subdivision  
MO5036117 Moore Bend Water Utility, LLC  
MO5036180 Taney Co Water LLC – Venice  
MO5036223 Taney Co Water LLC – Lakeway  
MO5036315 Riverfork Ranch Estates  
MO5040176 Midland Water Co

The department will be notifying the administrative contacts at the remaining 24 water systems in writing of the revocation and the need to obtain the services of a properly certified operator.

If you have any questions regarding this action, please contact Ms. Darlene Helmig in the Water Protection Program's Operator Certification Section at (573) 751-1600 or toll free at (800) 361-4827.

Sincerely,

WATER PROTECTION PROGRAM



John Madras  
Director

JM:dhj

c: Ms. Darlene Helmig, Chief, Operator Certification Section, Water Protection Program  
Ms. Cindy Davies, Director, Southwest Regional Office  
Mr. Tim Duggan, Acting Chief Counsel, Agriculture and Environment Division, AGO  
Mr. James A. Merciel, Missouri Public Service Commission  
Mr. James M. Owen, Acting Public Council, Office of the Public Council

DEPARTMENT OF NATURAL RESOURCES  
STATE OF MISSOURI

IN THE MATTER OF: )  
)  
Mr. Hollis H. Brower, Jr. )  
Certified Operator )  
Certificate of Competency #1822 ) No. PDWB-2016-078  
)  
SERVE: )  
Mr. Hollis H. Brower, Jr. )  
P.O. Box 1080 )  
Nixa, Missouri 65714 )

**ORDER OF REVOCATION OF MISSOURI CERTIFICATIONS  
FOR DRINKING WATER**

Under the authority of 10 CSR 60-14.020(7), and Section 640.130 of the Revised Statutes of Missouri, (RSMo), the Missouri Department of Natural Resources (Department), has the authority to deny, suspend or revoke an individual's drinking water operator certifications for exhibiting gross negligence, malpractice or incompetence in operating a public water system or falsifying facility operating records or reports required by 10 CSR 60.

While performing the duties of a certified drinking water operator, Mr. Hollis H. Brower, Jr. has exhibited gross negligence, malpractice and incompetence in operating public water systems. Mr. Brower has failed to properly notify water system customers of the need to boil their water, failed to provide written contract agreements, installed remote chlorine monitoring devices at drinking water systems without documenting the devices are reliable in accordance with EPA standard methods, and failed to conduct routine monitoring. These operational and maintenance problems have been documented at a number of systems owned or operated by Mr. Brower and translate to potential health concerns as well as disruption of service to customers of these systems. Pursuant to 10 CSR 60-14.020(7)(B), the Department hereby revokes the Drinking Water Treatment level A certificate and the Drinking Water Distribution level III certificate of competencies issued to Hollis H. Brower, Jr. under operator number 1822.

This Order is organized by public water system documenting Mr. Brower's specific actions as an operator. The document also lists concerns that affected multiple systems which are detailed following the individual systems. Appendix A is a list of violations that are operational in nature occurring at water systems where Mr. Brower is the responsible chief operator.

## BASIS OF REVOCATION

1. Missouri regulation 10 CSR 60-14.010(4)(A) states, in part, that water system owners shall place the direct supervision of each system under the responsible charge of a chief operator. The chief operator shall possess a valid certificate equal to or greater than the classification of the treatment facility or distribution system.
2. Missouri regulation 10 CSR 60-14.010(2)(C) defines a chief operator as a certified operator designated to have overall responsibility for the day-to-day process control and system integrity decisions regarding supervisory and operational activities that will directly impact the quality and quantity of drinking water. This individual must possess a certificate at the level of or higher than the classification of the treatment facility or distribution system for which he or she is responsible.
3. Missouri regulation 10 CSR 60-14.010(2)(B) defines a certified operator as any individual holding a valid water treatment or water distribution certificate of any level issued by the Department.
4. On August 1, 2001, the Missouri Department of Natural Resources (Department) issued Mr. Brower a level III Drinking Water Distribution, "DS-III", certification. There are three levels of this certification. The DS-III is the highest level, and the DS-I is the lowest.
5. On July 28, 1999, the Department issued Mr. Brower a level A Drinking Water Treatment, "DW-A", certification. There are four levels of this certification. The DW-A is the highest, and the DW-D is the lowest.
6. Mr. Brower is the president of Ozark International, Inc., d/b/a Water Technology of the Ozarks, located at 786 Croley, Nixa, MO 65714. Water Technology of the Ozarks provides contract operational services for public water systems.
7. Mr. Brower also owns a laboratory called Lakeland Laboratory that is certified to analyze microbiological samples for public drinking water systems.
8. As of February 16, 2016, Mr. Brower is the chief operator of 27 public water systems according to Department records.
9. As of February 16, 2016, Mr. Brower, or one of his companies, is the owner of seven (7) public water systems according to Department records.
10. As of February 16, 2016, Mr. Brower serves as the backup operator for four additional public water systems.
11. As of February 16, 2016, Mr. Brower, in total, is either the chief operator, back up operator, or the owner at 31 public water systems in Missouri.

### **Taney County Water LLC-Venice, Public Water Supply (PWS) ID MO5036180**

12. Taney County Water LLC-Venice, is a public water system serving an estimated population of 1,100. The water system is owned by Taney County Water, LLC. Mr. Brower is the organizer of the LLC. Mr. Brower is the administrative contact, the chief operator, and the sample collector. Lakeland Laboratory is the

- laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
13. On or about December 31, 2013, a system-wide drop in water pressure below 20 pounds per square inch (psi) was experienced due to water line breaks. Regulation 10 CSR 60-4.080(9) requires public water systems to maintain a minimum positive pressure of 20 psi throughout the distribution system under all normal operating conditions. Water pressures less than 20 psi can allow contamination to enter the water system through cross-connections and leaks.
  14. 10 CSR 60-8.010(2)(A)2, states that situations with the potential to have serious adverse effects on human health as the result of exposure require Tier 1 Public Notice.
  15. 10 CSR 60-8.010(2)(C)2 states that Tier 1 Public Notice must be provided within 24 hours in a form and manner reasonably calculated to reach all persons served by the water system. Notice must be made by one or more of the following forms of delivery: radio/television, posting the notice in conspicuous locations throughout the area served, hand delivery to persons served, or another delivery method approved by the Department.
  16. Providing public notice protects public health by informing affected customers of possible threats to their health and safety from the drinking water by recommending that they boil drinking and cooking water. It is important that people are given the opportunity to reduce exposure to potential microbiological contaminants by boiling water.
  17. On or about December 31, 2013, Mr. Brower failed to provide Tier 1 Public Notice when pressure fell below 20 psi in a manner that reasonably reached all persons served. His method of notifying the public was to place a recording on an answering machine for incoming phone calls and to mail notices to customers by United States mail. Mailing a hardcopy notice exceeds the 24 hour requirement and a recorded phone message does not reach all persons served.
  18. On January 3, 2014, Department of Natural Resources staff went to the site and conducted field analysis for chlorine levels. Department staff did not find measurable chlorine residual in the distribution system.
  19. State regulation 10 CSR 60-4.055(4) states, that residual disinfectant concentrations in the distribution system measured as total chlorine or combined chlorine cannot be less than 0.2 mg/l. Adequate chlorine residual is necessary to ensure that proper disinfection of the water is occurring throughout the distribution system.
  20. On January 3, 2014, the Department invoked its authority under Section 640.130 RSMo, 10 CSR 60-6.050 and 10 CSR 60-8.010(10) and issued a boil water order (BWO) and notified customers. The Department issued the BWO because Mr. Brower failed to provide public notice for the low-pressure event and the system failed to have sufficient chlorine residual.
  21. On January 6, 2014, Mr. Brower sent a letter to customers telling them the BWO would be lifted on January 14, 2014. The BWO was still in effect and Mr. Brower had no authority to provide this premature lift date to customers.

22. Per Section 640.130 RSMo, 10 CSR 60-6.050 and 10 CSR 60-8.010(10), BWOs remain in effect until the Department determines there is no longer a threat to the public health and safety. Mr. Brower did not have authority to lift the BWO issued by the Department. Samples had not come back yet to confirm the absence of microbiological contamination, which is necessary to determine the water is safe for drinking and cooking.
23. On February 5, 2014, the Department lifted the BWO after sample analysis showed appropriate chlorine levels and water sample results indicated no microbiological contamination.
24. Mr. Brower provided a premature lift date for the BWO and doing so placed human health at risk. Customers may not have boiled their drinking and cooking water while the BWO remained in effect because they received his correspondence.
25. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system. Maintaining chlorine residuals within this range ensures sufficient disinfectant is present in the water to control microbiological contaminants and protect public health. State regulation 10 CSR 60-4.080(3) requires operational testing of the chlorine residual to be monitored daily. Daily monitoring is necessary so the operator can make effective and timely adjustments to maintain the chlorine levels within the required range.
26. State regulation 10 CSR 60-4.080(1) and (2) requires that approved analytical methods must be used for water samples.
27. Prior to January 6, 2015, Mr. Brower installed on-line chlorine analysis equipment to continuously analyze the chlorine residual. Mr. Brower uses the on-line chlorine analysis equipment to report readings to him remotely rather than physically visiting the site daily to sample and analyze the water.
28. Mr. Brower has failed to document that the on-line chlorine analysis equipment is an approvable device capable of meeting accuracy and reliability standards. The U.S. Environmental Protection Agency's (EPA) document, *Method 334.0: Determination of Residual Chlorine in Drinking Water Using an On-line Chlorine Analyzer*, requires that a detailed method be used to document that an instrument meets criteria to demonstrate that it is accurate and reliable. EPA Method 334.0 requires that the instrument undergo a vetting period by comparing analytical results to another approved instrument. Readings from the instrument must be compared and calibrated to a separate, approved device on a weekly basis while the on-line instrument is in use to document its continued reliability.
29. Mr. Brower's on-line chlorine analysis equipment is not Department-approved for compliance purposes because he has failed to provide proper documentation as required by EPA Method 334.0.
30. On September 4, 2015, the Department received an environmental concern (#6249). The concerned party reported a water outage at their home. On September 4, 2015, Department staff contacted Mr. Brower regarding the concern. Mr. Brower stated he was unaware of any system issues and would contact the Department with additional information. Mr. Brower failed to contact the Department.

31. On September 10, 2015, Department staff followed up on the citizen concern and conducted an onsite investigation and found adequate water pressure in the system (42-57 pounds per square inch) but no chlorine residual. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system. Maintaining chlorine residuals within this range ensures sufficient disinfectant is present in the water to control microbiological contaminants and protect public health.
32. During the September 10, 2015 site visit, customers complained to Department staff about chronic water outages with no prior notice and few to no public notice advisories being posted afterward.
33. On September 10, 2015, Department staff collected two drinking water samples for microbiological analysis. Both sample results were positive for total coliform.
34. On September 17, 2015, Mr. Brower explained during a telephone conversation with Department staff that the lack of chlorine in the system was caused when the roof on the well house collapsed, blowing the fuse and the pump and draining the storage tank. Mr. Brower also stated that it had been repaired by 2:00 pm on September 4, 2015. This did not explain why the system had less than the detectable limits of chlorine residual on September 10<sup>th</sup> and again on September 22<sup>nd</sup> and November 12, 2015 which was after the repair work.
35. Failure to maintain residual chlorine levels between 0.2 mg/l and 4.0 mg/l in the distribution system is a violation of state regulation 10 CSR 60-4.055(4). In addition, 10 CSR 60-4.055(3) requires residual disinfectant concentration in the water entering the distribution system cannot be less than 0.5 mg/l free available chlorine for more than four hours. State regulation 10 CSR 60-4.055(3)(D) states that the Department must be notified no later than by the end of the next business day any time the disinfectant residual falls below 0.5 mg/l at the entry point to the distribution system. Mr. Brower failed to maintain the minimum residual disinfection concentration and also failed to notify the Department following the September 4, 2015, collapse of the well house roof.
36. On September 18, 2015, Mr. Brower stated to Department staff that the remote chlorine analysis equipment had been removed and chlorine levels are monitored manually once a week at the Honey Lane Well and every two or three days at the Redrock Well.
37. On September 22, 2015, Department staff was onsite and chlorine was again absent from the water system. Mr. Brower informed Department staff that the chlorinator for the Redrock Well had been unplugged since September 18, 2015. Five of the six microbiological samples collected on September 22, 2015 tested total coliform positive, including the source water sample from the Honey Lane Well. This resulted in a Maximum Contaminant Level violation for September of 2015. Mr. Brower was urged by the Department to perform public notice.
38. As of February 16, 2016, Mr. Brower has failed to provide records to demonstrate daily monitoring for free chlorine residual is being conducted at the entrance to the distribution system as required by 10 CSR 60-4.080(3).

### **Taney County Water LLC-Lakeway, PWS ID MO5036223**

39. Taney County Water LLC-Lakeway, is a public water system serving an approximate population of 370. The water system is owned by Taney County Water, LLC. Mr. Brower is the organizer of the LLC. Mr. Brower is the administrative contact, the chief operator, and the sample collector. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
40. On August 21, 2014, Department staff investigated Environmental Concern SW17899 regarding high chlorine levels in the water system. During the investigation, staff found total residual chlorine levels at the home at 1447 Lakeway to be greater than 8.8 mg/l which is more than double the Maximum Residual Disinfectant Level (MRDL) for normal operations. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system. Maintaining chlorine residuals within this range ensures sufficient disinfectant is present in the water to control microbiological contaminants and protect public health.
41. State regulation 10 CSR 60-4.055(5)(B) allows that disinfectant residuals can exceed 4.0 mg/L to address specific microbiological contamination problems caused by circumstances such as, but not limited to, distribution line breaks, contamination events, or cross-connection events.
42. During the Department's investigation, Mr. Brower stated that he thought the elevated chlorine was caused by a pump and he would visit the system on August 21, 2014 and let Department staff know what he had done to resolve the concern.
43. Mr. Brower failed to notify the Department of the outcome of his site visit.
44. The Department concludes that operational monitoring and sufficient analysis of the disinfection system was not conducted by Mr. Brower to maintain control of the process as required by 10 CSR 60-4.080(1).
45. On April 17, 2015, Department staff conducted an inspection of the water system. Mr. Brower was present during the inspection.
46. During the April 17, 2015 inspection, chlorine residual records were not available, and not provided upon request. This system voluntarily chlorinates. 10 CSR 60-4.080(1) requires sufficient analysis to maintain control of the treatment process. 10 CSR 60-9.010(1) requires records and operational monitoring to be retained on the premises or at a convenient location near the premises for a minimum of five years.

### **Riverfork Ranch Estates, PWS ID MO5036315**

47. Riverfork Ranch Estates is a public water system serving a population of approximately 370. The water system is owned by Riverfork Water Company. Mr. Brower is the president of Riverfork Water Company. Mr. Brower is the administrative contact, chief operator, and sample collector. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological



- contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
48. State regulation 10 CSR 60-4.055(4) and (5) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system. Maintaining chlorine residuals within this range ensures sufficient disinfectant is present in the water to control microbiological contaminants to protect public health. This system voluntarily chlorinates. 10 CSR 60-4.080(1) requires sufficient analysis to maintain control of the treatment process. Frequent monitoring is necessary so the operator can make effective and timely adjustments to maintain the chlorine levels within the required range.
  49. State regulation 10 CSR 60-4.080(1) and (2) requires that approved analytical methods must be used for water samples.
  50. Prior to January 6, 2015, Mr. Brower has installed on-line chlorine analysis equipment to continuously analyze the chlorine residual. Mr. Brower uses the on-line chlorine analysis equipment to report readings to him remotely rather than physically visit the site daily to sample and analyze the water.
  51. Mr. Brower has failed to document that the on-line chlorine analysis equipment is an approvable device capable of meeting accuracy and reliability standards. The U.S. Environmental Protection Agency's (EPA) document, Method 334.0: Determination of Residual Chlorine in Drinking Water Using an On-line Chlorine Analyzer, requires that a detailed method be used to document that an instrument meets criteria to demonstrate that it is accurate and reliable. EPA Method 334.0 requires that the instrument undergo a vetting period by comparing analytical results to another approved instrument. Readings from the instrument must be compared and calibrated to a separate, approved device on a weekly basis while the on-line instrument is in use to document its continued reliability.
  52. Mr. Brower's on-line chlorine analysis equipment is not Department-approved for compliance purposes because he has failed to provide proper documentation as required by EPA Method 334.0.
  53. On May 15-16, 2014, Environmental Concern SW17743 was investigated by Department staff. Customers called alleging odors were coming from the water system. Department staff found levels of total residual chlorine in the system greater than 8.8 mg/l which is more than double the Maximum Residual Disinfectant Level (MRDL) for normal operations. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system.
  54. On May 16, 2014, Department staff also found water pressure to be 12 psi at an address within the water system. Regulation 10 CSR 60-4.080(9) requires public water systems to maintain a minimum positive pressure of 20 psi throughout the distribution system under all normal operating conditions. Water pressures less than 20 psi can allow contamination to enter the water system through cross-connections and leaks.
  55. On August 21, 2014, Notice of Violation 15593SW was issued to Riverfork Water Company for failure to take action to correct a Significant Deficiency for low pressure in the system; failure to maintain minimum system pressure of 20

psi; failure to perform adequate Public Notice and failure to publish the Consumer Confidence Report in 2012.

### **Crystal Beach Subdivision, PWS ID MO5031192**

56. Crystal Beach Subdivision is a public water system serving an approximate population of 91. Bert Brower is the sample collector and operator of the system. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
57. Mr. Brower failed to collect routine microbiological samples during June 2015 which resulted in a monitoring violation for the system. 10 CSR 60-4.020(1)(B) requires a minimum of one sample per month for systems serving populations from 25 to 1,000. Mr. Brower failed to report monthly microbiological sample results within the first 10 days following the month in which the result is received as required by 10 CSR 60-7.010(1).
58. On September 28, 2015, Department staff conducted an inspection of the water system. Mr. Brower was present.
59. During the September 28, 2015 inspection, Department staff requested to review records of chlorine monitoring for the system. This system voluntarily chlorinates. 10 CSR 60-4.080(1) requires sufficient analysis to maintain control of the treatment process. 10 CSR 60-9.010(1) requires records and operational monitoring to be retained on the premises or at a convenient location near the premises for a minimum of five years. Mr. Brower did not have any documentation for chlorine analysis and further stated that he only monitors chlorine levels twice a month. Mr. Brower was informed that twice a month monitoring of chlorine was not sufficient to assure control of water quality. Frequent monitoring is necessary so the operator can make effective and timely adjustments to maintain the chlorine levels within the required range.
60. During the September 28, 2015 inspection, Department staff prepared to collect a microbiological sample from the system and asked Mr. Brower if he had a preferred sample location to use. Mr. Brower was unable to recall any of the Department-approved total coliform sample locations for the water system and stated that he usually finds a sample location by looking for a house where somebody is home. 10 CSR 60-4.020(1)(A) requires that total coliform samples must be collected according to a written sample siting plan at sites that are representative of water throughout the distribution system. The plan shall be made available upon request and the Department will either approve or recommend improvements. Mr. Brower failed to collect routine total coliform samples in accordance with a written sampling plan and demonstrated that he was unfamiliar with approved sample locations.
61. During the September 28, 2015 inspection, Department staff asked for a copy of the current written contract agreement between himself as the contract operator and the public water system. 10 CSR 60-14.010(4)(F) requires a written contract operator agreement to be in place that indicates the responsibilities of the

operator. Mr. Brower was unable to provide a copy and stated that if he had one, it was probably expired.

### **Valley Woods Subdivision, PWS ID MO5031152**

62. Valley Woods Subdivision is a public water system serving an approximate population of 135. The water system is owned by Valley Woods Utility, LLC. Mr. Brower is the organizer of the LLC. Mr. Brower is the administrative contact, the chief operator, and the sample collector. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
63. During the week of August 11, 2014, Mr. Brower reported to the Department, that the water system experienced a drop in pressure below 20 psi. Regulation 10 CSR 60-4.080(9) requires public water systems to maintain a minimum positive pressure of 20 psi throughout the distribution system under all normal operating conditions. Water pressures less than 20 psi can allow contamination to enter the water system through cross-connections and leaks.
64. 10 CSR 60-8.010(2)(A)2, states that situations with the potential to have serious adverse effects on human health as the result of exposure require Tier 1 Public Notice.
65. 10 CSR 60-8.010(2)(C)2 states that Tier 1 Public Notice must be provided within 24 hours in a form and manner reasonably calculated to reach all persons served by the water system. Notice must be made by one or more of the following forms of delivery: radio/television, posting the notice in conspicuous locations throughout the area served, hand delivery to persons served, or another delivery method approved by the Department.
66. Providing public notice protects public health by informing affected customers of possible threats to their health and safety from the drinking water by recommending that they boil drinking and cooking water. It is important that people are given the opportunity to reduce exposure to potential microbiological contaminants by boiling water.
67. August 19, 2014, Department staff received an environmental concern call from a resident of the subdivision and customer of the water system. The caller reported that boil advisory signs were posted in the subdivision following the low pressure event the previous week, but when she called the phone number on the sign for information, no one answered the phone.
68. On August 20, 2014, Department staff conducted a site visit to the water system to investigate. During the site visit, the water system was under a boil water advisory (BWA). Department staff observed that signs were posted at the entrance to the subdivision with a phone number to call for more information; however, when Department staff called the number, there was only a message saying, "At the tone leave a message." The Department concludes that no information related to the boil advisory was provided to callers.

69. On August 20, 2014, Department staff made contact with businesses that are customers of the water system (Gateway Café, KAMO Power, Amie's Salon and Stewart's Concrete). They all stated they had not been notified of the boil advisory. Mr. Brower failed to properly perform public notice in accordance with 10 CSR 60-8.010(2)(C)2 which states that Tier 1 Public Notice must be provided within 24 hours in a form and manner reasonably calculated to reach all persons served by the water system. Providing public notice protects public health by informing affected customers of possible threats to their health and safety from the drinking water by recommending that they boil drinking and cooking water. It is important that people are given the opportunity to reduce exposure to potential microbiological contaminants by boiling water.
70. August 28, 2014, the Department issued a Letter of Warning to the water system and addressed it to Mr. Brower. The letter states that posting of signs as a sole method of notification is not an adequate form of public notice and another method such as using door hangers (notices posted on each customer's door) must be implemented.

#### **Milano House, PWS ID MO5071108**

71. Milano House is a public water system serving a population of approximately 35. Bert Brower is the sample collector and operator of the system. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
72. On December 18, 2015, Department staff conducted a site visit to Milano House at the request of the maintenance worker. The maintenance worker was concerned because he had not seen Mr. Brower in some time, and he said the operational logs for the water system have not been completed since June of 2015. While on site, Department staff reviewed the operation and maintenance log from Milano House. The log showed monthly entries from January 2014 to June 2015. The last entry was made by Mr. Brower on June 19, 2015. There were no entries from June 19, 2015 through December 18, 2015, an approximately six month period.
73. The Department concludes that during the time where there were no log entries, Mr. Brower was not monitoring routine items including the monthly well usage readings, pressure, tank levels, free chlorine at the entry point to the system, and pump settings. 10 CSR 60-4.080(1) requires sufficient analysis to maintain control of the treatment process. 10 CSR 60-9.010(1) requires records and operational monitoring to be retained on the premises or at a convenient location near the premises for a minimum of five years.

### **Bramblewood Group Home, PWS ID MO5281373**

74. Bramblewood Group Home is a public water system serving an approximate population of 25. Bert Brower is the sample collector and operator of the system. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
75. On December 18, 2015, Department staff conducted a site visit to Bramblewood House at the request of the maintenance worker. The maintenance worker was concerned because he had not seen Mr. Brower in some time and the operational logs for the water system have not been completed since August of 2015. While on site, Department staff reviewed the operation and maintenance log from Bramblewood House. The log showed monthly entries from April 2014 to August 2015. The last entry was completed by Mr. Brower on August 15, 2015. There were no entries from August 15, 2015, through December 18, 2015, an approximately four month period.
76. The Department concludes that during the time where there are no log entries, Mr. Brower was not monitoring routine items including the monthly well usage readings, pressure, tank levels, free chlorine at the entry point to the system, and pump settings. 10 CSR 60-4.080(1) requires sufficient analysis to maintain control of the treatment process. 10 CSR 60-9.010(1) requires records and operational monitoring to be retained on the premises or at a convenient location near the premises for a minimum of five years.

### **Ozark Co PWSD #1, PWS ID MO5024444**

77. Ozark Co PWSD #1 is a public water system serving an approximate population of 200. Bert Brower is the sample collector and operator of the system. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
78. The system is required per 10 CSR 60-4.060 to collect quarterly samples for radionuclide analysis.
79. Department staff called Mr. Brower to remind him that the third quarter sample was due by September 30, 2015.
80. Mr. Brower failed to submit the sample prior to the deadline.
81. On November 10, 2015, the system received a monitoring violation for failing to perform the 3rd quarter monitoring for radionuclides as required by 10 CSR 60-4.060.
82. On December 6, 2015, Mr. Brower collected two radionuclide samples on the same day. He submitted one of the samples as the 3<sup>rd</sup> quarter sample and the other was submitted as the 4<sup>th</sup> quarter sample. Both samples were mailed to the Missouri Department of Health and Senior Services State Health Lab at the same time for analysis. The 3<sup>rd</sup> quarter sample was rejected because it was 2.5 months late.

### Cape Fair Estates, PWS ID MO5031343

83. Cape Fair Estates is a public water system serving a population of 113. Bert Brower is the sample collector and operator of the system. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
84. On October 15, 2015, the Department received an environmental concern from a customer of this water system. The individual said there wasn't any chlorine in the water and they had looked at water sample results online for the water system and did not know where the "Dana Road" address is where samples were listed as being collected.
85. On October 26, 2015, Department staff conducted an onsite investigation. Dana Road could not be found in the subdivision or in neighborhoods adjoining the system. A review of sample records shows that "323 Dana Rd." has been used eight times in the past year for the sample location when that address does not exist. Mr. Brower did not answer the phone, nor did he return the call to the Department representative regarding this investigation.
86. The Department concludes that Dana Road does not exist as a sample location for water analysis. Recording an address for a sample location that does not exist is considered falsifying documents. It is unknown where the eight samples listed as being collected from Dana Road were actually collected.
87. On October 26, 2015, Department staff spoke to a resident of the subdivision. The resident reported persistent low water pressure for two weeks. Department staff asked if they knew where Dana Road was, and she responded that she had lived there for 22 years and there is no such road. Field tests were conducted from outside her home with results of 65 psi, 0.08 mg/l total chlorine residual, 0.03 mg/l free chlorine residual. This system voluntarily chlorinates. The Chlorine levels were below the required levels for disinfection. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system. Department staff also collected a water sample for microbiological analysis. The microbiological sample came back safe.
88. On October 26, 2015, Department staff conducted field analysis and collected a microbiological sample from a second residence in the subdivision. The results of field tests were 55 psi, 0.08 mg/l total chlorine residual, and 0.03 mg/l free chlorine residual. Chlorine levels were below the required levels for disinfection. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system. The microbiological test came back safe.
89. The water pressure readings from the October 26, 2015, were above 20 psi as required by 10 CSR 60-4.080(9), but there was virtually no chlorine in the system. Per 10 CSR 60-4.055, the system must maintain 0.2 mg/l chlorine at all points in the distribution system. Field analysis for chlorine conducted on October 26, 2015 by Department staff documents failure to meet this requirement.

90. On December 9, 2015, Department staff followed up on the October 26, 2015 event and went to a location within the water system to monitor total residual chlorine in the distribution system. The resulting field test was 0.02 mg/L which is below the level required for disinfection. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system.
91. Department staff concludes, based on the low values of chlorine residual found in the distribution system, that Mr. Brower is not performing sufficient monitoring to maintain control of the chlorine levels within the system. 10 CSR 60-4.080(1) requires sufficient analysis to maintain control of the treatment process.

### **Moore Bend Water Utility, PWS ID MO5036117**

92. Moore Bend Water Utility, LLC, is a public water system serving an approximate population of 28. The water system is owned by Moore Bend Water Utility, LLC. Mr. Brower is the organizer of the LLC. Mr. Brower is the administrative contact the chief operator, and the sample collector. Lakeland Laboratory is the laboratory that analyzes samples from the system for microbiological contaminants. The water system meets the definition of a public water system in accordance with 10 CSR 60-2.010(2)(P)8.
93. On February 5, 2013, prior to Mr. Brower's purchase of the water system, a boil water order was issued in response to E. coli positive sample results collected from Well #1. The water system did not have adequate detention time for disinfection purposes. The water system was instructed to add disinfection with adequate detention time to treat the water. Chlorine does not kill bacteria, viruses, or cysts instantly. 10 CSR 60-4.025(4)(A)4.B.II requires adequate contact time with the water for chlorine for disinfection and virus inactivation.
94. In October of 2013, Moore Bend Water Utility, LLC purchased the public drinking water system.
95. On November 14, 2013, the Department issued a Notice of Violation (#15071SW) for failure to take corrective action because adequate detention had not been provided. It also sites a failure to notify customers that the Boil Water Order issued on February 5, 2013 remained in effect.
96. On April 10, 2014, Administrative Order on Consent No. PDWB-2014-049 became effective and enforceable. As part of the AOC, Mr. Brower agreed to and was ordered to immediately begin testing and recording free chlorine residuals on a daily basis and submit a copy of the records by the 15<sup>th</sup> of each month. It also required Mr. Brower to continue to re-issue notice of the Boil Water Order to the water system's customers each month until the Boil Water Order is lifted.
97. On July 3, 2014, the Department sent Mr. Brower a letter notifying him that the chlorine records due each month by the 15<sup>th</sup> had not been received and were overdue.
98. On July 14, 2014, the Department received a response from Mr. Brower. Mr. Brower provided a site sampling plan and an Emergency Operations Plan,

- satisfying those requirements of the AOC, but did not provide daily chlorine residual monitoring records.
99. On October 9, 2014, a final inspection was made by Department staff for the installation of chemical injection pumps, solution tanks, and detention tanks installed at Well #1 and Well #2. The report noted that daily monitoring of the chlorine concentration is not being conducted. State regulation 10 CSR 60-4.080(3) requires operational testing of the chlorine residual to be monitored daily. Daily monitoring is necessary so the operator can make effective and timely adjustments to maintain the chlorine levels within the required range. Until daily records demonstrate the system is working in accordance with requirements, the boil water order cannot be lifted.
  100. On December 17, 2014, the Department sent Mr. Brower a letter informing him of the failure to monitor and document daily chlorine residuals as agreed to in the signed the AOC. The letter states that beginning immediately chlorine residual must be tested and recorded along with pH and temperature daily using the form provided and submitted to the Department by the 10<sup>th</sup> of the next month.
  101. On February 4, 2015, the Department sent Mr. Brower correspondence reminding him that the signed AOC requires public notice to be performed monthly until the Boil Water Order is lifted. The AOC was signed on April 10, 2014, and requires within 10 days of the effective date of the AOC to post Public Notice informing customers of the ongoing Boil Water Order. The water system shall continue to re-issue notice of the BWO each month. According to the AOC, public notice should have been provided by April 20, 2014, and each month thereafter. Mr. Brower failed to conduct monthly notification.
  102. On February 15, 2015, Mr. Brower responded in writing regarding the requirement to provide continued monthly public notice. He questioned the need to provide notice saying that the system was under a boil order long before he became owner.
  103. On April 3, 2015, the Department responded to Mr. Brower's letter stating that that no verification has been received that the water system is complying with disinfection requirements because Mr. Brower has failed to submit chlorine residual records. The boil order will remain in effect until the Department can verify that the system is meeting disinfection requirements. The letter advises Mr. Brower that he has failed to provide continued public notice of the boil water order and is in violation of the terms of the AOC. Mr. Brower has demonstrated negligence or unwillingness to provide copies of routine daily monitoring for the disinfection system.
  104. On May 29, 2015, the Department sent a letter to Mr. Brower urging him to begin testing and recording chlorine residuals on a daily basis and submit the records to the Department. Mr. Brower was also urged to continue to re-issue notice of boil water order to customers each month until the order is lifted.
  105. The Boil Water Order for this system remains in effect.



### **Consumer Confidence Reports – Multi-System Concern**

106. 10 CSR 60-8.030(1)(C) requires that each public water system provide a Consumer Confidence Report (CCR) to customers by July 1 annually. The report must contain data collected during, or prior to, the previous calendar year. By July 1, 2015, CCRs for the 2014 calendar year were required to be provided to customers.
107. 10 CSR 60-8.030(4)(G) requires that no later than October 1, 2015, systems must certify to the Department that the CCR for 2014 calendar year was delivered to customers.
108. For the 2014 calendar year, Mr. Brower failed to certify that CCRs were delivered to the customers of 16 of the water systems that he operates. Mr. Brower, or his companies, owns seven of these water systems. As a result, the following systems received a Notice of Violation:
- A. Mr. Brower listed as Administrative Contact and Operator
    - MO5031152 Valley Woods Subdivision
    - MO5036027 Bilyeu Ridge Water Company, LLC
    - MO5036117 Moore Bend Water Utility, LLC
    - MO5036180 Taney Co Water LLC – Venice
    - MO5036223 Taney Co Water LLC – Lakeway
    - MO5036315 Riverfork Ranch Estates
    - MO5040176 Midland Water Co
  
  - B. Mr. Brower listed as the Operator
    - MO5010025 Arcola
    - MO5031315 James River Estates Subd
    - MO5031325 Golden Oak Village Subd
    - MO5031343 Cape Fair Estates
    - MO5036090 Village of Coney Island
    - MO5036258 Eastborough Subd
    - MO5036300 Oaks Homeowner Assn Water Dist
    - MO5039093 Country Meadows Estates
    - MO5048165 Timbercrest Mobile Home Park

### **Chlorine Residuals – Multi-System Concern**

109. On January 28, 2016, February 4, 2016 and February 5, 2016, Department staff conducted field analysis for chlorine residual from systems that Mr. Brower operates. State regulation 10 CSR 60-4.055(4) requires residual chlorine levels be maintained between 0.2 mg/l and 4.0 mg/l in the distribution system. Two of the following water systems, The Landing Subdivision and Moore Bend, are required to disinfect, while the others provide voluntary disinfection. The following

public drinking water systems had chlorine levels outside of the 0.2mg/l to 4.0 mg/l range. The sample analysis that had no detectable chlorine value is listed as "ND". Department staff concludes that Mr. Brower is not performing sufficient monitoring to maintain control of the chlorine levels within these systems.

Water System Name	System ID	1/28/2016		2/4/2016				2/5/2016
Oaks Homeowners Assn Water Dist	MO5036300	0.06 mg/l	-	-	-	-	-	-
Country Meadows Estates	MO5039093	0.04 mg/l	0.02 mg/l	-	-	-	-	-
Midland Water Co	MO5040176	>8.8 mg/l	>8.8 mg/l	-	-	-	-	-
Golden Oak Village	MO5031325	ND	-	-	-	-	-	-
<b>The Landing Subdivision (required disinfection)</b>	<b>MO5036218</b>	<b>0.03 mg/l</b>	-	-	-	-	-	<b>ND</b>
Timbercrest Mobile	MO5048165	0.03 mg/l	-	-	-	-	-	-
Blue Water Village/Blakewood Subdivision	MO5031128	0.04 mg/l	0.07 mg/l	-	-	-	-	-
Cape Fair Estates	MO5031343	0.07 mg/l	0.07 mg/l	-	-	-	-	-
<b>Moore Bend Water Utility LLC (required disinfection)</b>	<b>MO5036117</b>	<b>0.37 mg/l</b>	<b>0.20 mg/l</b>	<b>&gt; 8.8 mg/l</b>	<b>&gt;8.8 mg/l</b>	0.51 mg/l	2.81 mg/l	-

### CONCLUSION - REVOCATION

Therefore, under the authority of Sections 640.100, RSMo, 640.130, RSMo and 10 CSR 60-14.020(7), the Department hereby revokes Mr. Hollis H. Brower, Jr.'s Missouri Operator Certifications for Drinking Water Treatment level A and Drinking Water Distribution level III certificate of competencies issued under operator number 1822. The revocation is effective immediately upon receipt.

As such, Mr. Brower may not perform the duties of an operator of public water systems in the State of Missouri. Any water systems affiliated with Mr. Brower as a certified operator, will be notified by the Department in writing of the revocation and the need to obtain the services of a properly certified operator.

Within 60 days of the effective date, Mr. Brower, as the administrative contact of the water systems, shall submit the name, certificate number, and contact information to the Department of the designated chief operator for the public water systems. Those water systems are:

- MO5031128 Blue Water Village/Blakewood Subdivision
- MO5031152 Valley Woods Subdivision
- MO5036117 Moore Bend Water Utility, LLC
- MO5036180 Taney Co Water LLC – Venice

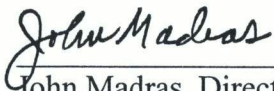
MO5036223 Taney Co Water LLC – Lakeway  
MO5036315 Riverfork Ranch Estates  
MO5040176 Midland Water Co

This Order will be public record under Chapter 610, RSMo.

If you were adversely affected by this decision, you may be entitled to pursue an appeal to the Administrative Hearing Commission (AHC). To appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

DEPARTMENT OF NATURAL RESOURCES

SO ORDERED this 19<sup>th</sup> day of April, 2016:



John Madras, Director  
Water Protection Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102

C: Mr. Tim Duggan, Acting Chief Counsel  
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Jefferson City, MO 65102

Ms. Cindy Davies  
Southwest Regional Office  
2040 W. Woodland  
Springfield, MO 65807



PWSID #	Water System Name	Date	Violation Name	Analyte Name	Citation of Law
MO5031128	Blue Water Village/Blakewood Subdivision	12/3/2013	Monitoring (TCR), Routine Minor – Not enough samples submitted	Coliform- Total Coliform Rule (TCR)	10 CSR 60-4.020(1)(B)
MO5031128	Blue Water Village/Blakewood Subdivision	10/31/2013	Monitoring (TCR), Repeat Major – No repeats were submitted	Coliform (TCR)	10 CSR 60-4.020(2)(E)
MO5031128	Blue Water Village/Blakewood Subdivision	1/7/2013	Consumer Confidence Report (CCR) - failure to submit	CCR	10 CSR 60-8.030
MO5031128	Blue Water Village/Blakewood Subdivision	1/15/2014	CCR Report - failure to submit	CCR	10 CSR 60-8.030
MO5031128	Blue Water Village/Blakewood Subdivision	11/13/2014	CCR Adequacy/Availability/Content	CCR	10 CSR 60-8.030
MO5031128	Blue Water Village/Blakewood Subdivision	10/28/2013	Monitor Ground Water Rule (GWR) Triggered/ Additional, Major – failure to conduct source water sampling	Escherichia coli (E. Coli)	10 CSR 60-4.025(3)(A)3
MO5031128	Blue Water Village/Blakewood Subdivision	12/31/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5031128	Blue Water Village/Blakewood Subdivision	2/18/2015	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5031128	Blue Water Village/Blakewood Subdivision	11/10/2015	Follow-up or Routine Tap M/R (LCR)	Lead & Copper Rule	10 CSR 60-15.010(8)
MO5031152	Valley Woods Subdivision	2/22/2013	Monitoring (TCR), Repeat Major - No repeats were submitted	Coliform (TCR)	10 CSR 60-4.020(2)(E)
MO5031152	Valley Woods Subdivision	1/16/2014	CCR Report - failure to submit	CCR	10 CSR 60-8.030
MO5031152	Valley Woods Subdivision	4/24/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5031315	James River Estates Subd	11/18/2015	Failure to Consult, GWR (#20)	Groundwater Rule	10 CSR 60-4.025(4)4
MO5031420	Bridgeport 1st Addition	2/10/2015	Initial Tap Sampling (LCR)	Lead & Copper Rule	10 CSR 60-15.010(8)
MO5036027	Bilyeu Ridge Water Company LLC	11/19/2013	Follow-up or Routine Tap M/R (LCR)	Lead & Copper Rule	10 CSR 60-15.010(8)
MO5036027	Bilyeu Ridge Water Company LLC	12/4/2015	Monitoring (TCR), Routine Minor – Not enough samples submitted	Coliform (TCR)	10 CSR 60-4.020(1)(B)
MO5036090	Village of Coney Island	5/20/2013	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5036090	Village of Coney Island	10/2/2013	Monitor GWR Triggered/Additional, Major	E. Coli	10 CSR 60-4.025(3)(A)3
MO5036090	Village of Coney Island	11/24/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036090	Village of Coney Island	11/10/2015	Monitoring, Routine Major - Failed to monitor	Radionuclides	10 CSR 60-4.060
MO5036090	Village of Coney Island	11/18/2015	Failure to Consult, GWR (#20)	Groundwater Rule	10 CSR 60-4.025(4)4
MO5031192	Crystal Beach Subdivision	10/31/2015	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5036117	Moore Bend Subdivision	11/5/2013	Monitoring, (GWR), Assessment, Major	E. Coli	10 CSR 60-4.025(3)(B)
MO5036117	Moore Bend Subdivision	11/19/2013	Follow-up or Routine Tap M/R (LCR)	Lead & Copper Rule	10 CSR 60-15.010(8)
MO5036117	Moore Bend Subdivision	11/26/2013	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3

MO5036117	Moore Bend Subdivision	12/2/2013	Monitoring, (GWR), Assessment, Major	E. Coli	10 CSR 60-4.025(3)(B)
MO5036117	Moore Bend Subdivision	1/16/2014	CCR Report - failure to submit	CCR	10 CSR 60-8.030
MO5036117	Moore Bend Subdivision	1/27/2014	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036117	Moore Bend Subdivision	3/5/2014	Monitoring, Routine Major	Coliform (TCR)	10 CSR 60-4.020(2)(E)
MO5036117	Moore Bend Subdivision	4/8/2014	Failure to Consult, GWR (#20)	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	5/2/2014	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036117	Moore Bend Subdivision	6/18/2014	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036117	Moore Bend Subdivision	9/2/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036117	Moore Bend Subdivision	3/27/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	5/27/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	6/29/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	7/28/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	8/31/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	9/25/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	10/28/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	11/30/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	12/29/2015	Monitoring, RTN/RPT Major (GWR) - failure to monitor chlorine	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036117	Moore Bend Subdivision	1/6/2016	Monitoring (TCR), Routine Major - Failed to monitor	Coliform	10 CSR 60-4.020(1)(C)
MO5036180	Taney Co Water LLC - Venice	2/1/2013	Monitor GWR Triggered/Additional, Major	E. Coli	10 CSR 60-4.025(3)(A)3
MO5036180	Taney Co Water LLC - Venice	4/1/2013	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036180	Taney Co Water LLC - Venice	5/1/2013	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036180	Taney Co Water LLC - Venice	10/31/2013	Monitor GWR Triggered/Additional, Major	E. Coli	10 CSR 60-4.025(3)(A)3
MO5036180	Taney Co Water LLC - Venice	10/31/2013	Monitoring (TCR), Repeat Major - No repeats submitted	Coliform (TCR)	10 CSR 60-4.020(2)(E)
MO5036180	Taney Co Water LLC - Venice	11/19/2013	Follow-up or Routine Tap M/R (LCR)	Lead & Copper Rule	10 CSR 60-15.010(8)
MO5036180	Taney Co Water LLC - Venice	12/3/2013	Monitoring (TCR), Repeat Major	Coliform (TCR)	10 CSR 60-4.020(2)(E)
MO5036180	Taney Co Water LLC - Venice	1/16/2014	CCR Report - failure to submit	CCR	10 CSR 60-8.030
MO5036180	Taney Co Water LLC - Venice	3/21/2014	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3

MO5036180	Taney Co Water LLC - Venice	3/21/2014	Monitoring (TCR), Routine Minor – Not enough samples submitted	Coliform (TCR)	10 CSR 60-4.020(1)(B)
MO5036180	Taney Co Water LLC - Venice	4/24/2014	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036180	Taney Co Water LLC - Venice	4/14/2015	Failure to Consult, GWR (#20)	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036180	Taney Co Water LLC - Venice	4/16/2015	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036180	Taney Co Water LLC - Venice	7/10/2015	Failure to Address Deficiency (GWR)	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036180	Taney Co Water LLC - Venice	10/20/2015	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036180	Taney Co Water LLC - Venice	12/29/2015	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036218	The Landing Subdivision	5/21/2014	Lead Consumer Notice (LCR)	Lead & Copper Rule	10 CSR 60-15.010(7)
MO5036223	Taney County Water LLC – Lakeway	11/19/2013	Follow-up or Routine Tap M/R (LCR)	Lead & Copper Rule	10 CSR 60-15.010(8)
MO5036223	Taney County Water LLC - Lakeway	1/16/2014	CCR Report - failure to submit	CCR	10 CSR 60-8.030
MO5036223	Taney County Water LLC - Lakeway	7/10/2015	Failure to Consult, GWR (#20)	Groundwater Rule	10 CSR 60-4.025(4)4
MO5036223	Taney County Water LLC - Lakeway	10/9/2015	Failure to Address Deficiency (GWR)	Groundwater Rule	10 CSR 60-4.025(5)
MO5036258	Eastbournough Subdivision	9/14/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036258	Eastbournough Subdivision	7/1/2015	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5036258	Eastbournough Subdivision	8/31/2015	Monitoring (TCR), Routine Minor – Not enough samples submitted	Coliform (TCR)	10 CSR 60-4.020(1)(B)
MO5036258	Eastbournough Subdivision	10/20/2015	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5036315	Riverfork Ranch Estates	8/8/2013	Failure to Address Deficiency (GWR)	Groundwater Rule	10 CSR 60-4.025(5)
MO5036315	Riverfork Ranch Estates	1/16/2014	CCR Report - failure to submit	CCR	10 CSR 60-8.030
MO5036315	Riverfork Ranch Estates	1/27/2014	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5040176	Midland Water Co	1/16/2014	CCR Report - failure to submit	CCR	10 CSR 60-8.030
MO5040176	Midland Water Co	11/13/2014	CCR Adequacy/Availability/Content	CCR	10 CSR 60-8.030
MO5041419	Hideaway MHP	5/28/2015	Monitoring (TCR), Routine Minor – Not enough samples submitted	Coliform (TCR)	10 CSR 60-4.020(1)(B)
MO5048165	Timbercrest Mobile Home Park	1/6/2016	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048231	Shady Oak MHP	10/1/2015	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048237	Country Estates MHP	8/4/2014	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048237	Country Estates MHP	9/2/2014	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048237	Country Estates MHP	10/30/2014	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048237	Country Estates MHP	12/4/2014	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048237	Country Estates MHP	12/31/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5048237	Country Estates MHP	4/1/2015	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)

MO5048237	Country Estates MHP	4/30/2015	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048237	Country Estates MHP	5/28/2015	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5048237	Country Estates MHP	7/1/2015	Monitoring (TCR), Routine Major – Failed to monitor	Coliform (TCR)	10 CSR 60-4.020(1)(C)
MO5182571	Mid America Hardwoods	1/21/2014	Monitor GWR Triggered/Additional Major	E. Coli	10 CSR 60-4.025(3)(A)3
MO5210920	Hickory Ridge Highway 83 Marina and Resort	6/24/2013	Monitor GWR Triggered/Additional, Minor	E. Coli	10 CSR 60-4.025(3)(A)3
MO5210920	Hickory Ridge Highway 83 Marina and Resort	7/19/2013	Monitor GWR Triggered/Additional, Minor	E. Coli	10 CSR 60-4.025(3)(A)3
MO5210920	Hickory Ridge Highway 83 Marina and Resort	8/7/2013	Monitoring (TCR), Repeat Major – No repeats were submitted	Coliform (TCR)	10 CSR 60-4.020(2)(E)
MO5210920	Hickory Ridge Highway 83 Marina and Resort	8/23/2013	Monitoring (TCR), Routine Minor – Not enough samples submitted	Coliform (TCR)	10 CSR 60-4.020(1)(B)
MO5210920	Hickory Ridge Highway 83 Marina and Resort	11/1/2013	Public Notice Rule Linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5210920	Hickory Ridge Highway 83 Marina and Resort	12/23/2013	Monitoring (TCR), Routine Major – Failed to monitor	Coliform	10 CSR 60-4.020(1)(C)
MO5210920	Hickory Ridge Highway 83 Marina and Resort	9/2/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5210920	Hickory Ridge Highway 83 Marina and Resort	9/29/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5210920	Hickory Ridge Highway 83 Marina and Resort	10/22/2014	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5210920	Hickory Ridge Highway 83 Marina and Resort	3/2/2015	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3
MO5292389	Pyramid Foods	9/21/2015	Public Notice Rule linked to Violation	Public Notice	10 CSR 60-8.010(1)(C)3