

Date Signed: August 5, 1997

Dear Colleague:

I am pleased to transmit a copy of the final State Source Water Assessment and Protection Programs Guidance which EPA has prepared pursuant to the requirements of sections 1453 and 1454 of the Safe Drinking Water Act (SDWA), as amended in August 1996. States and EPA regions will be using this guidance as states develop Source Water Assessment Programs over the next 18 months. With approval of their programs, states will be responsible for completing source water assessments for all public water systems.

The guidance also addresses opportunities to go beyond the assessments and implement source water protection activities and programs. Prevention is a major theme of the SDWA amendments. It is the clear desire of Congress and the expectation of EPA that the required source water assessments will lead to local source water protection programs that will help prevent contamination of drinking water supplies. The SDWA amendments offer tools to help develop these protection programs, including funding through the Drinking Water State Revolving Fund. Through passage of the amendments, the President and Congress have committed the nation to building a pollution prevention barrier to drinking water contamination. The law challenges each of us to do our part in carrying out this commitment.

This guidance reflects the efforts of a wide array of stakeholders from states, local governments, water providers, business and environmental and citizens groups, and other federal agencies. Through a variety of forums people and organizations around the country took the opportunity to participate directly in development of EPA guidance and policy. The formal comment period on the guidance closed June 13, 1997, and we received and considered over 100 public comments. A comment/response summary is attached for your information.

As we listened to stakeholders, a clear message emerged that states need flexibility to tailor programs and manage their resources. The final guidance responds to this concern by specifying what EPA believes state programs need to incorporate to meet statutory intent; but at the same time it allows states to propose alternative solutions to meet the same intent. We received an equally important message that feedback through broad public involvement should guide state choices. Here, the guidance both responds to this concern and reflects statutory requirements and intent by specifying a strong public involvement process for Source Water Assessment Programs development.

We appreciate the efforts of each and every stakeholder. We hope that this open and inclusive process serves as a model for how the Agency will do business in the future. Now, with the release of this guidance, the opportunities for action move from Washington out into the nation

through the states. Interested organizations and individuals have a key role to play in source water protection, and a unique opportunity to set a course for the future. I urge you to be actively engaged as this guidance is implemented and to encourage and assist your colleagues in participating in partnership with the states and others.

Thank you for your commitment to make the new Safe Drinking Water Act a success.

Sincerely,

Bob Perciasepe
Assistant Administrator

Attachments

EPA Response to Major Issues

FOR THE NATIONAL GUIDANCE ON STATE SOURCE WATER ASSESSMENT AND PROTECTION PROGRAMS

Clarification of EPA's Source Water Assessment and Protection Programs Goal

Many commenters requested that EPA clearly state its goals for source water assessment and protection programs. Many suggested that these goals be measurable and based on baseline data.

The statutorily defined goals for source water assessment and protection programs (SWAPS) are to provide for the "protection and benefit of public water systems and for the support of monitoring flexibility." These are the basic and most important review criteria for state submittals. The President and the Congress view these assessments as activities that should not be done for their own sake, but as activities leading to the protection of source waters and providing the basis for meeting the Act's requirements, particularly those giving greater flexibility to reduce costs and maintain the delivery of safe water to the public.

Indeed, in the House Commerce Committee Report language (House Report 104-632, Part 1), it states that, "the Committee recognizes that source water protection can be cost-effective strategy for ensuring safe drinking water supplies... To address source water protection, the bill creates a new program in which states with primacy will conduct an assessment, coordinated with existing information and programs, to determine the vulnerability of sources of drinking water within state boundaries... designed to protect source water from threats identified during the assessment." Furthermore, the Senate Committee report provides that, "the only options typically available to community water systems finding contaminants in their water supply have been treatment or the development of new water supplies... To remedy this problem, the bill adds a new section to the Safe Drinking Water Act that provides a means other than treatment for community water systems to address problems or emerging problems of contamination," that is, petition programs and source water protection efforts.

EPA will measure whether states are meeting the assessment program goals by ensuring that states develop and implement assessment programs so that protection actions and/or monitoring flexibility will result from the assessments. That is, EPA will work with states to do the assessments not only efficiently but also in such a way that the information in the assessments accurately, albeit at differing levels of detail, permit management actions to reduce contamination from the sources identified as significant threats to drinking water. EPA strongly believes that states, with stakeholder involvement prior to and during the assessments, will be able to achieve these goals through these assessments.

For protection, EPA has a goal that "by the year 2005, 60 percent of the population served by community water systems will receive their water from systems with source water protection programs in place." To achieve this goal, EPA will build upon the collective efforts accomplished so far under Safe Drinking Water Act programs (e.g. Wellhead Protection Program) and Clean

Water Act Programs (e.g. Watershed Approach and Nonpoint Source Program) and other agency initiatives (e.g. Comprehensive State Ground Water Protection Programs as part of the Watershed Approach). Furthermore, EPA will use the many new tools provided by the new SDWA Amendments of 1996, such as the new Drinking Water State Revolving Fund. While not statutorily mandated, EPA firmly believes this goal is desirable and achievable on a nationwide basis.

States may choose additional goals that provide further indicators of success. For example, some states have baseline monitoring data on water quality and previous inventories of contamination sources which could be used to measure drinking water quality or reductions in contaminant sources or threats. EPA, however, will not require development of such baseline data since there are not enough federal resources to develop this data and also accomplish the congressionally mandated assessments. EPA encourages states, where they have readily available baseline data for a source water protection area, to track such measurable results, if feasible, given state resources and total resources available for assessments and protection programs.

Source Water Assessments are Mandatory

Some commenters questioned whether source water assessments are, in fact, statutorily mandated in the new SDWA Amendments.

The statute clearly mandates that states develop and implement state source water assessment programs. Section 1453(a)(3) of the Act requires primacy states to submit source water assessment programs to EPA for approval within 18 months after the Agency publishes final guidance. Under section 1453(a)(1), EPA is required to issue guidance for "primacy states to carry out directly or through delegation...a source water assessment program within the state's boundaries." Every stage for an assessment program, as set out in sections 1453(a)(2) and (3), contains specific requirements regarding content and time frame of a state's SWAP and is explicitly mandatory ("shall"), making the assessment program as a whole mandatory for primacy states. Congress clarified its intent in the House Commerce Committee Report (House Report 104-632, 5) stating that "[t]he bill creates a new program under which states exerting [sic] primacy must conduct an assessment of source water areas and, to the extent practical, identify the origins of any contaminants within each delineated area" [emphasis added].

Clarification of What is Required for State Source Water Assessment Program Submittals

Some commenters wanted to know what requirements were absolute, with little or no flexibility and which requirements were based on EPA's interpretation of the statute, therefore allowing a state to provide alternative approaches from what the guidance specifies.

Many of the requirements for state submittals are explicitly required by sections 1428 and 1453 of the SDWA: advisory committee(s), public hearings, and other outreach efforts prior to submitting the program; delineation, inventories of significant sources of contamination and

determinations of susceptibility for all PWSs; and the policy and processes for how the state will make assessments available to the public. In addition, the state SWAP is statutorily required "for the protection and benefit of public water systems."

Many other elements of a state submittal, however, EPA believes are crucial to demonstrate that the state program will meet the intent of the SDWA provision. For example, EPA believes a state "needs to" include in its submittal a summary of the advice from the advisory committee(s) regarding key program development questions. A state has the option of demonstrating that it has an equivalent alternative to what EPA says a state "needs to" include. If the state shows that it has an alternative for any EPA-specified requirement, the Agency will approve that aspect of the submittal.

Public Participation Issues in the Development and Implementation of Source Water Assessment Programs and Protection Programs

Many commenters addressed the issue of whether the citizens advisory committee and the technical advisory committee could be combined, and whether a past or on-going committee or other participation efforts are sufficient to meet the guidance's requirements. While some commenters opposed a combined committee because of the potential for diluting a particular interest, others cited examples of successful one-committee public participation. Some states, noting that stakeholders have not been interested in serving on advisory committees in the past, supported the idea that other public participation mechanisms could substitute for the committee. Finally, many commenters objected to EPA's defining what sorts of groups should be included on an advisory committee.

The statute at section 1428(b) says that states must involve the public to the maximum extent practical, and must establish a Technical Advisory Committee and a Citizens Advisory Committee. The final guidance permits a state to combine these committees into one committee only if the state can demonstrate through committee structure, membership, and process that the combined committee can provide for both the citizens and technical viewpoints specified by Congress. In its submittal, the state will need to describe clearly the purpose of a technical focus for public involvement and of a citizen's focus for public involvement. States must ensure that their programs are reviewed from each perspective.

- The technical advisory committee provides recommendations or makes decisions on technical advantages and/or disadvantages in terms of cost, data standards, feasibility and sound science, as well as the likely effectiveness and feasibility of approaches to assessments.
- The citizens advisory committee particularly provides the link to drinking water consumers, local officials, and affected landowners in order to provide perspective on acceptable protection and the economic and political impacts of choices. The

purpose of the citizens advisory committee is to provide the policy and politics side of the issues.

Involving the public to the "maximum extent possible," as required by the statute at 1428(b), includes offering adequate opportunity for membership on the advisory committee and for participation in the planning activities. The guidance requires that states provide adequate opportunities to various general categories of groups, such as public interest groups. One option for a state to demonstrate that "adequate opportunity" was provided is to have offered financial assistance for travel by members of the committee in need. EPA believes that encouraging public involvement to the maximum extent possible needs to be demonstrated through wide and effective advance notice of the involvement process; wide distribution/availability of decision planning documents with adequate time to review; meaningful and substantial opportunities to provide detailed comments representative of all interested sectors; and provision of direct, genuine feedback from state program officials.

To the extent that a state has implemented these requirements for public participation during development of its Wellhead Protection Program and/or Watershed Approach (or when developing the state's ground water or surface water programs) and these programs included delineations, source inventories, and susceptibility determinations similar to the requirements in the final guidance, the state needs to undertake only those public participation requirements it has not previously completed.

Differentiating Assessments to Complete Them for All PWSs Within the Allowed Timeframe

Many commenters recommended that EPA permit states to do different types of assessments for different types of Public Water Systems (PWSs). These commenters stated that it would be very difficult and not benefit many PWSs to do the same type of assessment or level of effort for each PWS.

EPA agrees, and therefore the guidance permits states the option of using different levels of assessments (i.e., with different degrees of exactness for delineations and detail for inventories and susceptibility determinations) for individual categories of PWSs. A state's submittal needs to include an explanation of what approach was chosen, why the state chose that approach, and how the state will complete all the assessments within the statutory time frame. When determining the level of assessment (i.e., exactness/detail) for each category of system, states may consider, separately or together:

- Previous assessment efforts
- Types and extent of threats
- Type (e.g., community, non-community) and size of system
- Objectives of the source water assessments

Whatever approach the state chooses, EPA recommends that the state's first steps are to

review relevant available sources of existing data at the federal, state and local levels. This would include gathering and analyzing the data to determine what additional information may be collected and analyzed to complete individual assessments done under a wellhead protection program or state watershed approach; vulnerability assessments; sanitary surveys; monitoring programs; delineations and assessments done under a state management plan for pesticides; and any other delineations and assessments done under the Clean Water Act or under state or local statutes.

Significant Potential Sources of Contamination

Some commenters recommended that EPA specifically define what sources of contamination needed to be in inventories; others wanted to leave it to state discretion. In related comments, some did and some did not want EPA to require states to specifically describe in their submittals which contaminant sources would be the focus of the inventory efforts.

The final guidance provides states with the discretion to determine what types of potential sources will be considered "significant." However, states need to choose one or both of the following two approaches to determine which types of potential sources are significant.

- Define a significant potential source of contamination as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants of concern and has a sufficient likelihood of releasing such contaminants to the environment at levels that could contribute significantly to the concentration of these contaminants in the source waters of the public water supply(s); or
- Describe how an initial susceptibility determination for the public water system(s) will lead to identification of the types of significant potential sources that will be inventoried.

Other commenters focused on how the inventories would be accomplished, and who would actually do them (e.g., states, localities, or volunteers). EPA recognizes that completion of these inventories take resources and recommends that, as one possibility, states set up community volunteer programs under state or other appropriate quality supervision that can accomplish lower-cost methods to locate potential sources of contamination. EPA recommends credible groups within each source water protection area do the inventories such as the elderly, through RSVP programs or younger people such as the Girl Scouts, Boy Scouts, or 4H club members.

Names and Addresses

States, agricultural representatives, and water suppliers commented that any listing of names and addresses of sources of contamination or identifying of sources on maps will reduce the effectiveness of protection actions, and therefore states should not have the option of listing or mapping inventoried sources by name and address even if already in other public databases. Some commenters also argued that listing in this way would be alarmist to the public, if released,

particularly if the inventoried sources were in compliance with federal, state and local laws. Other commenters, however, strongly believe that listings of names and addresses of inventoried sources should be mandated on states as part of every assessment.

The final guidance suggests that states list names and addresses of inventoried sources of contamination if a state determines that: (1) it will enhance the effectiveness of source water protection actions; and (2) it will not discourage voluntary implementation of protection measures.

Some potential sources of contamination that are complying with federal, state and local statutes may nonetheless be found to be significant and therefore need to be inventoried. That is, a source's compliance with governmental laws does not necessarily mean that a PWS is not susceptible to that source. Potential sources that could be in inventories include, but are not limited to, Superfund sites, Toxics Release Inventory sites, National Pollution Discharge Elimination System permittees, or Resource Conservation and Recovery Act sites, underground storage tanks, non-point sources, and future sources.

Susceptibility Determinations

A few commenters have argued that the susceptibility determinations should not be a required part of assessments, but if they are, EPA should explain exactly what level of detail is expected of such determinations in an assessment.

The final guidance, based on clear congressional intent, requires a susceptibility determination as part of each assessment because it is the way specified in the statute for a state to make the inventory useful for source water protection programs, monitoring flexibility and choosing among treatment options. The House Committee report (cited earlier) stipulated that source water protection programs should be "designed to protect source water from threats identified during the assessment." For all but the smallest source water protection areas, simply identifying the numerous significant potential sources of contamination does not in itself determine which of them may or may not present threats to drinking water or how to prioritize their management in order to protect drinking water. Without a susceptibility determination, these decisions are virtually impossible.

EPA will be publishing a technical document to assist the states in accomplishing efficient and effective susceptibility determinations. This document will provide technical guidance on conducting scientific analysis of: the hydrogeology and/or hydrology of the source waters; contaminant fate and transport in source waters; and the effectiveness of existing prevention and mitigation measures.

Assessments for Ground Water Based Systems

Many commenters were concerned about how wellhead protection programs (WHPs) integrate with the new SWAPs. For example, most states clearly wanted WHPs to be

grandfathered in when it came to performing delineations and assessments. On the other hand, environmental organizations argued that EPA should require states go beyond typical wellhead protection area (WHPA) delineation (i.e., only areas adjacent to the well or wellfield) to include all recharge areas, even if not adjacent to the well, for all PWSs based on ground water.

The final guidance says that the state program submittal needs to indicate that the delineation of source water protection areas for ground water based systems will be in accordance with accepted methods under section 1428 of the SDWA (for Wellhead Protection Programs) as described in EPA's publication titled "Guidelines for Delineation of Wellhead Protection Areas," published in June, 1987. Where a state has an EPA-approved WHP Program, a state may continue with the delineation approach established by that program. However, whether the state has an approved program or not, it may choose to adopt the delineation approach employed by another state's EPA-approved WHP program for the hydrogeologic settings common in both states. EPA recommends that, in either case, a state consider modifying the WHP Program approach, where necessary, to take advantage of the regulatory flexibility to be offered to states and public water systems under such future rules as the Ground Water Disinfection Rule.

There are situations for ground water systems where states need to delineate additional recharge areas beyond the traditional wellhead areas. In cases where a protection area contiguous to the well or wellfield would alone be inadequate to provide for the protection and benefit of the PWS, states need to delineate recharge areas that are not adjacent to or surrounding the well.

EPA expects states to implement full WHPs under section 1428 of the SDWA, even though the three steps of delineation, inventory, and susceptibility are basic requirements under the new section 1453. Section 1428 was continued in SDWA 1996 and therefore all states are still required to establish and implement full Wellhead Protection Programs. States that take the Wellhead Protection Program set-aside will particularly be expected to make progress in implementing voluntary or mandatory management measures as well as contingency plans and policies for new wells.

Assessments for Surface Water Based Systems

Some commenters want to require delineations across state lines, so that consumers have full disclosure of all information about the entire upstream watershed. Many states, however, expressed concern about the practicality of coordinating multi-state efforts.

For systems using surface water, the final guidance follows the statute's requirement that states delineate the entire watershed area (topographic boundary) within that state's borders, upstream of a PWS intake. Where water is diverted into this area from another watershed(s), the watershed area(s) upstream of each diversion structure would also need to be delineated, again up to the state's borders.

To have an approvable submittal, the final guidance explains, each state needs to describe in its submittal a plan to make the maximum practical effort to coordinate with neighboring states

on interstate source water areas. EPA will assist the states, if requested, through a coordinating role at the regional level by facilitating discussions and providing technical assistance.

Further, the final guidance notes that since it would often not be practical to inventory all potential contamination sources in the watershed area, the state has the option of segmenting each watershed area into discrete segments based on relative susceptibility. That is, a state can choose to segment the delineated watershed area(s) into units (e.g., stream segments, buffer zones, sub-watershed areas) for more cost-effective analysis. Based on the determination of what types of sources are significant for each area, the state may inventory only those sources in each area.

Information to be Made Available to the Public and Appropriate Time Frames for Distribution

Several commenters from states, agriculture, and industry are opposed to requiring full disclosure of all the data collected during the assessments. Some states are opposed to making the assessments available quickly and want to wait to release the assessments only after the results are analyzed and final for all of a state's source water protection areas. Other commenters, however, encouraged mandating complete disclosure of all the data and analysis within a given period after each assessment is complete.

For an approvable SWAP submittal, a state must describe how it will ensure that the results of the assessments are made available to the public, either directly or through a delegated entity, in an expeditious manner after the results are done. A state needs to make available all information collected during each assessment, when requested. Furthermore, states need to create maps as part of the results of the assessment, and those maps need to include the delineated area and the sources of contamination described in the inventory. EPA recommends that a state:

- Create a brief report understandable to the general public in an expeditious manner after the assessment is finished.
- Make the report widely available via the Internet and other means.
- Provide widespread notification of availability (such as through bill stuffers) describing in detail how the public can obtain a hard copy (using state rules for charging for copies).
- Permit the public to request a copy through postage-free return mail cards, a free call-in number, and Internet posting.

Timetable for Implementation of Assessments

States have made the strong argument that completing assessments for all PWSs in 2 years will not permit them to do the quality assessments that are necessary to lead to effective source water protection programs.

EPA agrees and therefore will consider extension requests at the time of initial submittals of SWAPs. To be approvable, request to extend the deadline for completing the state's SWAP, must be made based on:

- Consideration of the availability to the state of funds under the DWSRF under section 1452 of the Act. That is, based on its approved program, a state must show that additional time is needed to complete the assessments based on an analysis of how much DWSRF funding it is spending to do the assessments. For this reason, EPA encourages states to determine how much it would cost to complete the assessments for their source water protection areas, and then take up to the full 10 percent allowed from the FY 1997 funds.
- Consideration of other relevant factors such as the planned level of complexity of assessments, or emergencies such as natural disasters.

For the initial program submittal, a state can provide a rationale for the eventual extension of the timeframe and base its submitted timeframes and priorities on the extended deadline. EPA will make a determination of the timeframe extension as part of the approval of the state's program. As long as the extension requests provide cogent reasons using the permitted rationale, EPA will grant the extension.

Sufficient Resources

Some commenters want EPA to recognize it is approving a program, not just a plan, and argue that, therefore, EPA should not approve a state's program unless the state demonstrates in its submittal that it really will commit sufficient resources, either using the DWSRF, other federal resources, state resources, and possibly private resources to do the assessments for all PWSs within the timeframe of its approved program. That is, EPA should judge whether the state has committed to expend sufficient resources to do these assessments, and if not, disapprove the program.

EPA agrees and the final guidance declares that states need to include in their submittals an explanation of how the state will fund implementation of the assessments for all PWSs. Without this explanation, it will be difficult for EPA to know whether the states' description of the rest of its program is practical and will actually result in protecting and benefitting PWSs.

Grandfathering Previous Assessments

There was great concern among commenters as to how past efforts, such as approved Wellhead Protection Programs, Comprehensive State Ground Water Protection Programs (CSGWPP), or local level source water protection programs are integrated with the new state source water assessment and protection programs.

States should take full advantage of analyses done or data collected when they delineated

wellhead areas or assessed surface waters. One of the first steps in any SWAP should be a review of relevant, available sources of existing data (including susceptibility determinations) at the federal, state, and local levels. This would include gathering and analyzing the data to determine what additional information may need to be collected and analyzed to complete individual assessments and the state's assessment program. States need to determine whether previously completed assessments meet the goals and requirements of the SWAP in regards to delineation, contaminant source inventory, and susceptibility analysis. If a previously completed assessment does not meet all the requirements of the SWAP, the state must refine the assessment to include the missing elements.

Although previously completed assessments may be acceptable, states should take advantage of the opportunity to update or expand previously completed assessments.

Protection and Petition Programs

Many commenters believe that the guidance needs to discuss all the options which are available to states for prevention programs, with a focus on what is eligible for funding through the Drinking Water State Revolving Fund (DWSRF). Other commenters felt that EPA should focus more, if not exclusive, attention on the section 1454 Petition Program because of EPA's statutory requirement to develop guidance for this program.

Incorporating the above concerns, the Petition Program is given a larger part of Chapter 3 in the final guidance with a new subsection describing its benefits and limitations. Nonetheless, in addition to the discussion on Petition Programs, EPA provides a broad overview of the range of options available to states to establish and support protection programs under the DWSRF, particularly under section 1452(g)(2)(B) of the DWSRF statutory provision.

States and local communities need to consider the net benefit of the section 1454 Petition Program in comparison to either a modified petition process or a broader based source water protection program. Limiting a state to voluntary incentive based programs could result in a fragmentation of regulatory and non-regulatory programs whereas a more integrated program could be more efficient. While the petition program may help communities move towards source water protection for chemical contaminants, the program is not a prevention program in the traditional sense. To make the petition program more useful, states may modify the Petition Program to address some of these limitations. Such modified programs would be eligible for DWSRF set-asides under sections 1452(g)(2)(B) and (k)(A)(ii).

A state's section 1454 Petition Program is subject to approval by EPA only if the state is to receive funds to administer the program from funds specifically authorized under that section. To date, EPA has not requested such funds and no funds have been mandated. Nonetheless, guidance on the petition program may help states determine how best to structure a workable vehicle for encouraging local partnerships.

Coordination Among State Agencies To Do the Assessments

Many commenters argued that EPA needs to assure coordination at the state level in order for the assessments to actually be accomplished. Many state commenters noted that the drinking water programs cannot do the assessments alone because of the lack of access to the data and the lack of staff resources.

The requirement for states to develop and implement SWAPs is not intended to overburden state drinking water programs. EPA fully expects that state Clean Water Act and agriculture agencies will work closely with the drinking water and ground water programs regardless of the agencies in which they are located. If this coordination does not occur, it is quite possible that the state may not be able to accomplish quality assessments within the timeframe provided for in the Safe Drinking Water Act.

EPA believes that the cooperating agencies and programs should, as one of their first steps in developing the state's source water assessment program, review available sources of existing data at the federal, state, and local levels. Such information sources could include delineation and assessments done under a state wellhead protection program or state watershed approach; vulnerability assessments; sanitary surveys; monitoring programs; delineations and assessments done under a state management plan for pesticides; and any other delineations and assessments done under the Clean Water Act or under other state or local statutes. These linkages can be important for building a strong base of information for source water assessments, as well as for initiating and evaluating mitigation, protection, and restoration strategies, contingency planning, and emergency response.

Consideration of Future Rules on Monitoring, Ground Water Disinfection, Filtration and Underground Injection When Establishing and Implementing Assessment Approaches

EPA suggests that states consider the possible impact of rules which will be promulgated during the time that states are undertaking the source water assessments. Such rules include alternative monitoring, the Ground Water Disinfection rule, the Enhanced Surface Water Treatment rule and the Class V Underground Injection Control rule. EPA recognizes commenters' concerns of the difficulty of predicting what will be required under these rules.

One of the benefits of source water assessments is that they can provide the basis for regulatory flexibility under current or planned rules. EPA believes that the resulting savings can greatly benefit many PWSs and the states; therefore, the state needs a process for updating completed assessments. Therefore, EPA recommends that states include a plan to update the assessments in the SWAP submittal. The SWAP, albeit mandated, is an opportunity to use available resources, including the DWSRF set-aside, to do a complete and comprehensive assessment for each PWS or group of PWSs. The more comprehensive and current an assessment, the more it is likely to be useful in the future.

Coordination with Other EPA Programs and Other Federal Agencies' Environmental Programs to Assist the States in Implementing Source Water Assessment and Protection

Program Approaches

Many commenters noted that federal agencies have data and information that could assist states in implementing source water assessments. However, these commenters believe that this data and information is very scattered across federal agencies and is not readily available.

EPA is committed to assisting the states do the assessments. We already have many resources to assist the states. For example, a comprehensive listing of all Wellhead Protection Technical Assistance Documents and how to secure them is described in a document titled "Office of Ground Water and Drinking Water (OGWDW) Publications" (EPA 810-B-96-001). Other documents and information on source water and wellhead protection are available at OGWDW's Internet homepage found at [<http://www.epa.gov/OGWDW>]. Another compendium now available on the Internet [<http://www.epa.gov/owow/watershed/tools/>] is titled "Watershed Tools Directory: A Collection of Watershed Tools" (EPA 841-B-95-005). These documents are available by calling the Safe Drinking Water Hotline at (800) 426-4791.

There are several forthcoming documents on delineation methods such as "State Source Water Protection Area Delineation Methods For Surface Water Drinking Water Supplies," "Delineation of Source Water Protection Areas: An Integrated Approach for Ground and Surface Waters," "Case Studies For the Conjunctive Delineation of Ground-Water/Surface-Water Source Water Protection Areas," and a "Compendium of Wellhead Protection Area Delineation Documents."

In addition, over the next 2 years, EPA will be sponsoring with other organizations, source water assessment/protection conferences/meetings. One meeting in 1997 will be a conference with the National Governors' Association and five other state executive branch organizations. Another, tentatively scheduled for the spring of 1998, there will be a conference titled, "Source Water Quality and Protection: Delineation, Monitoring and Effectiveness."

Furthermore, EPA's data management program for ambient water quality is centered on EPA's STorage and RETrieval system (STORET). This database contains decades of raw surface and ground water data. STORET is currently being modernized to more effectively handle the complex needs of the nation's evolving monitoring programs with the help of the National Water Quality Monitoring Council, a consortium of public (including EPA) and private monitoring agencies. In addition, the National Water Quality Inventory Report to Congress (the "305(b)" Report) contains state assessments as to whether a particular water body meets its designated use as drinking water. For more information visit EPA's homepage [<http://www.epa.gov/owow/monitoring/>].

EPA will continue its work with the states to produce comprehensive, multi-year monitoring strategies that can serve as a base for source water assessment programs, and at minimum may be closely linked with monitoring and assessment of specific source waters. Guidelines for the 1998 305(b) report calls for states to include plans of how they will achieve comprehensive monitoring coverage of their waters, including assessment for drinking water designated use where applicable.

EPA is also working to strengthen state geo-referencing capabilities to better track monitoring information for mapping and Geographic Information System (GIS) applications. GIS tools, including the Reach File 3 system that assigns unique locational identifiers to the waters of the U.S., will be valuable in source water assessments.

There are extensive databases at other federal agencies, such as through the Department of Interior (e.g. United States Geological Survey) and the Department of Agriculture. EPA plans to publish additional guidance describing how states can better access EPA's as well as other Federal agency's databases to assist with assessment and protection programs.

State Source Water Assessment and Protection Programs Guidance

This guidance is too large to include in this manual. To obtain a copy of this guidance, see Index 5 of this manual.

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