

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GUIDANCE FROM HOTLINE COMPENDIUM

WSG H10
Date Issued: July 1988

SUBJECT: Scope of NPDWR Coverage

SOURCE: Ray Enyeart

A forest products company employs 50 workers on a lumbering project for 90 days in an isolated region. The location of the project prevents the delivery of drinking water from a public water supply system via pipeline. As a result, the project's drinking water supply must be trucked into the project area. Upon arrival, the water is stored in large tanks and then distributed to various parts of the project as needed. Must the operator of this project comply with SDWA regulations that are applicable to public water suppliers? Or, is the owner/operator of the project simply a customer of the water supplier that trucks in the water? Further, is the truck regulated under the SDWA?

Response:

The lumber camp water supply is, by the Safe Drinking Water Act (SDWA) definition, a public water system (PWS). However, not all PWSs are covered by the National Primary Drinking Water Regulations (NPDWRs). Section 1411 of the SDWA and Section 141.3 of the NPDWRs specify the coverage. In short, if the water system at the lumber camp: a) does not collect, treat, or sell the water, b) obtains all of the water from (but is not owned or operated by) a PWS which is covered by the NPDWRs, and c) does not convey passengers in interstate commerce, then the system is not subject to the NPDWRs. If ANY of these conditions are not met then the lumber camp's system is subject to the NPDWRs.

The truck which transports the drinking water to the lumber camp is, in EPA's opinion, a "water hauler" and is also a PWS (see Water Supply Guidance #35, dated November 26, 1976). However, like the water system at the lumber camp, it is not subject to the NPDWRs as long as it meets all of the conditions described in the above paragraph.