

CWA-SDWA Collaboration

Ground Water Protection Council Annual Forum
September 24, 2013

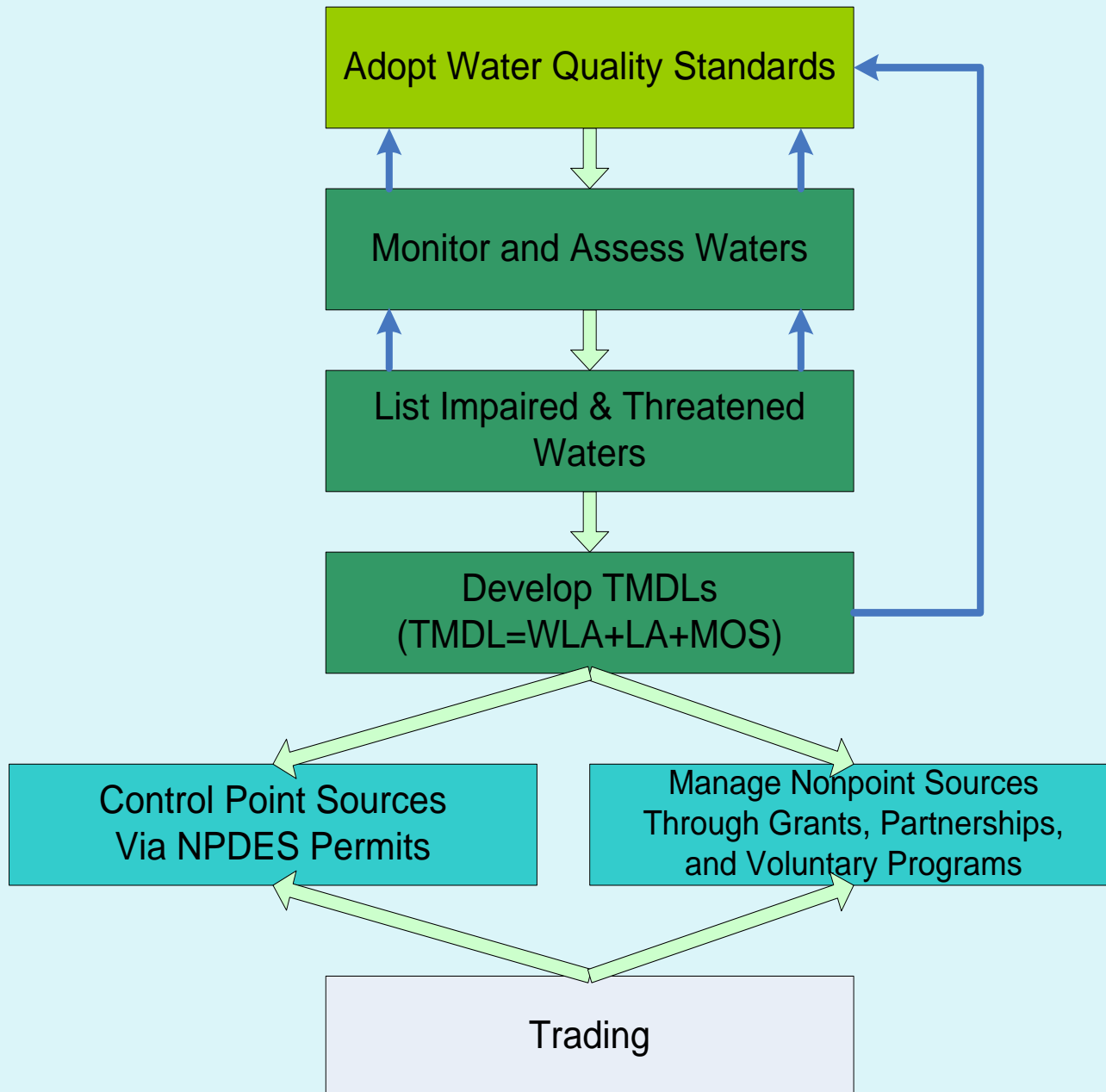
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Why Protect Sources of Drinking Water?

- **Cost:** It's often less costly to remove pollutants at their source (whether point or nonpoint) than to treat them at the drinking water treatment utility.
- **Effectiveness:** Public health is better protected- many pollutants pass through or are only partially treated by conventional water treatment facilities. Pollutant reduction at the source also makes treatment more reliable.
- **Why are we looking to the CWA?** The SDWA provides few tools to affect source water protection; those tools and authorities reside in other programs – particularly, in the CWA (including the WQS, NPDES, 303(d)/TMDL, and NPS programs) as well as USDA authorities and programs.

Clean Water Act Framework



Why Collaborate?



- * **Better protect water quality for *all* uses:** protecting surface and ground water drinking water sources provides a more holistic approach to water resource management and includes issues related to both source water *quality* and *quantity*.
- * **Bang for the Buck:** on-the-ground activities, such as agricultural best management practices, can have multiple benefits to CWA and SDWA programs.
- * **Public health as a motivator for water quality protection:** involving the drinking water community brings a broader group of stakeholders who are invested in the quality and quantity of their source waters from a public health and economic perspective.
- * **Source water-related funding may be leveraged in source water protection areas:** EPA-supported pilots, workshops and DWSRF set-asides.

CWA-SDWA Collaboration Initiative Overview

(endorsed by Regional WDDs and OW Office Directors)

- **Goal:** Better quality drinking water sources, both surface and ground water, now and in the future
- **Objectives:** EPA and its partners will increase focus on drinking water sources to better protect human health, minimize the burden of new or additional drinking water treatment costs, and make progress towards achieving water quality objectives through collaborative actions among CWA, SDWA and other programs to:
 - ✓ Protect healthy source waters
 - ✓ Reduce existing source water impairments
 - ✓ Improve water quality for all uses

Expectations and Opportunities

- **We View this as a Win-Win Opportunity:** We Want to Achieve Our *Mutual Goals*.
- **This is Not a Bunch of “New Stuff” to Do:** Rather it’s about some possible shifts in “how” we set priorities and do business.
- **Should it be about on-the-ground Place-Based Activities or Tweaks to Organizations and Tools?** *Both* – they’re mutually supportive.
- **These Tools and Opportunities are a Menu of Options:** Initiative may not look the same in every Region and state.
- **So, What are the Next Steps?**

The Game Plan

- **CWA Tool Workgroups:**
 - *Water Quality Standards/303(d) lists*
 - *TMDLs; 319 Programs*
 - *NPDES/Pretreatment Programs*
- **Develop relatively short support document for each tool:**
 - Special considerations for practitioners using those tools – based on experiences and best practices developed .
 - Recommended actions for various parties (e.g., EPA-HQ, EPA-Regions, or states) that “*hard-wire*” improved collaboration around these tools (e.g., policies, tools, annual state/Regional commitments)
- **Topic Specific/Place-based Workgroups:**
 - Additional workgroups will be formed around specific topical challenges, with particular, place-based implications. (e.g., nutrients and bromides).
- **Data/Information (including Analytical Tools):** Underlie all we do, help us target & measure results.

Select WQS and NPDES Workgroup Recommendations (so far):

- * Identify approaches for translating a narrative water quality criterion to water quality-based effluent limits where no §304(a) or state criteria exist for source waters approaching or exceeding drinking water Maximum Contaminant Levels.
- * Develop water quality-based effluent limits and local limits for POTW industrial users.
- * Notify PWSs of potential impacts from NPDES spills or discharges on downstream sources of drinking water.
- * Explore ways to address potential implications for surface and ground water quality from green infrastructure/ stormwater practices.

Select 303(d)/TMDL/NPS Workgroup Recommendations (so far – cont.):

- * Identify opportunities for utilizing source water monitoring data for making CWA §303(d) listing decisions.
- * Highlight case studies where CWA §319 has protected source water and opportunities to include source water protection in state nonpoint source management plans.
- * Better utilize CWA §319/ nonpoint source funding for ground water protection.
- * Highlight opportunities for TMDLs to protect source water
- * Identify best ways to leverage the DWSRF, CWSRF, and other funding sources

Discussion

- 1) *How would you refine our list of potential recommendations?*
- 2) *Are there any key recommended practices that you think we're missing?*
- 3) *What are some good case examples of some of these best practices?*
- 4) *What are some of the principal obstacles for implementing these various recommendations and what ideas do you have for overcoming those obstacles?*