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EPA DRINKING WATER PROGRAM REDIRECTION PROPOSAL

A Public Comment Draft

DRINKING WATER PROGRAM REDIRECTION PROPOSAL

U.S. Environmental Protection Agency
November 1995

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APPENDIX A

EXECUTIVE SUMMARY

Background

During 1995, the U.S. Environmental Protection Agency (EPA) conducted an extensive reassessment of its drinking water protection program in response to a number of issues which were being raised within the Agency, by a wide range of interested parties and by Congress. The purpose of the reassessment was to assist the Agency in:

- Formulating comprehensive redirection objectives that can serve to guide Agency activities related to drinking water;
- Identifying and implementing high-priority activities that will maximize risk reduction;
- Realigning resources within the Office of Water's drinking water program at EPA Headquarters to support as many of the activities as possible; and
- Utilizing improved coordination with other Agency offices and the Regions to support the redirection effort.

The Agency based the reassessment on extensive input provided by a wide array of stakeholders on specific parts of the program. EPA obtained a wide range of comments through a series of public meetings involving over 500 stakeholders (including individuals associated with States, water suppliers, local governments, consumer groups, environmental organizations, businesses and industries, academic institutions, the agricultural community, or other interests) who attended meetings or provided written comments.

This document describes the outcome of the reassessment process, including proposed resource realignments within the Office of Water's drinking water program at EPA Headquarters. **EPA is seeking public comment by January 17, 1996,** on this comprehensive program strategy prior to the Agency's efforts to finalize its plans for redirecting the drinking water program. **Written comments should be directed to: Redirection Comment Clerk, Water Docket MC4101, Environmental Protection Agency, 410 M Street SW; Washington, DC 20460.**

Redirection Objectives and Resource Choices

To guide Agency decisions in redirecting the drinking water program, EPA identified four primary objectives, each of equal importance to ensuring safe drinking water:

- Sound science and adequate data;
- Risk-based priorities for setting high-quality standards;

- Strong, flexible partnerships with States and local governments in implementation; and

- Community-based, effective source water protection.

As part of the reassessment process, EPA's Office of Water considered how resources within its drinking water program at Agency Headquarters should be utilized to support these objectives. The resulting set of Office of Water investments and disinvestments represents an attempt to balance the four objectives while also providing for Headquarters involvement in specific activities where most necessary.

Analysis based on FY 1995 resource levels showed, however, that it will not be possible for the Office of Water to fully address all four objectives, given the current distribution of drinking water program resources. To adequately address priorities related to sound science, standard setting and chemical monitoring reform, the Office will have to scale back or defer other critical activities, presently carried out at Headquarters, related to source water protection and implementation of the Public Water System Supervision (PWSS) program. The breadth of standard-setting activities under the drinking water program would also be reduced (pending the development of necessary agreements to extend court-ordered schedules for certain contaminants) to enable the Agency to focus on the highest-priority rules.

The Office of Water plans will explore with EPA's Regions possibilities for specific opportunities for Regions to support the redirection by taking the lead on certain national priority activities where there is Regional expertise or the potential to develop expertise. Similar discussions are anticipated with other Agency offices.

Office of Water Investments and Disinvestments

Among its priority activities in support of the redirection objectives, EPA's Office of Water will:

- Emphasize the development of new safety standards for high-priority microbial contaminants such as *Cryptosporidium*;

- Strengthen the scientific basis for selecting contaminants for future safety standards;

- Improve risk assessment for better decision-making and priority-setting;

- Streamline and simplify chemical monitoring regulations to eliminate unnecessary requirements and to allow the States as much implementation flexibility as possible;

- Upgrade the national drinking water data management system to help States ensure that existing safety standards are met;

- Revise the State Program Priorities Guidance for the Public Water System Supervision (PWSS) Program to enable States to direct their resources towards activities that will achieve the greatest risk reduction;

- Encourage the development and use of treatment technologies which are affordable for small water systems; and

- Provide essential technical support to the Partnership for Safe Water -- an innovative, voluntary effort by water suppliers to better protect consumers from microbial contaminants in surface water.

The Office of Water will also continue to carry out key efforts related to source water protection and implementation of the PWSS Program, but at significantly lower levels of investment than has previously been the case.

- Helping communities prevent pollution of their drinking water sources:

  - The Office will continue to carry out the Wellhead Protection Program and the Underground Injection Control Program to help communities that rely on ground water, but will do less in these areas.

  - Similarly, less will be done to develop and facilitate the local use of ground water indicators.

  - Office of Water staff support for Comprehensive State Ground Water Protection Programs will continue at minimal levels.

  - The Office will maintain a very limited presence in support of its recent source water protection initiative for communities that use surface waters.

- Implementation support for the PWSS Program:

  - The Office of Water will continue to meet its fundamental obligations such as maintaining essential communication and coordination with the States and Regions, awarding and managing State grants, and responding to Freedom of Information Act requests.

  - Other Office activities (e.g., various types of technical assistance and outreach to States, Tribes, Regions and water suppliers) under the PWSS program will be discontinued or reduced.

Public Comment Issues and Next Steps

The Agency's intention is that the redirection effort will ultimately result in stronger

science and improved approaches to standard-setting without compromising critical efforts to prevent pollution of drinking water sources and to ensure the efficient implementation of existing safety standards. **Through the public comment process for this proposal, EPA is seeking stakeholder input on the following questions:**

- **Do the primary objectives of sound science, risk-based standard setting, implementation partnerships and source water protection, as described in Section III, provide an appropriate basis for redirecting the drinking water program?**

- **Has the Agency made the right choices for utilizing Office of Water resources and do these choices provide an appropriate balance among the four redirection objectives?**

- **Are there other ways that Office of Water resources could be utilized to more effectively and efficiently support the four objectives?**

- **How can the expertise and capabilities of other EPA offices, the Regions, the States, water suppliers and other stakeholders be brought to bear to address unmet national needs?**

EPA also plans to consult during the public comment period with the National Drinking Water Advisory Council (NDWAC) to obtain the Council's recommendations on the proposals contained in this document. The Agency will finalize the redirection plan on completion of negotiations to extend court-ordered schedules for rule development and after considering NDWAC's recommendations and other stakeholder comments.

Realignments within the Office of Water's drinking water program at Headquarters that reflect preliminary redirection decisions will, to the extent feasible, begin in FY 1996. The Office of Water will in the meantime work closely with the Regions to determine how the Regions can support the Agency's drinking water program redirection objectives and to identify specific opportunities for Regions to step into national leadership roles.

The Agency is committed to the Administration's goals of reinventing government. The redirection plan, as well as reorganization and streamlining efforts which are also related to broad Administration initiatives, should be in place and operating during FY 1996 In the meantime, the Agency will continue to work with Congress towards a balanced reauthorization of the SDWA that would also support the objectives of the redirection proposal.

DRINKING WATER PROGRAM REDIRECTION PROPOSAL

U.S. Environmental Protection Agency
November 1995

I. Background and Purpose

During 1995, the U.S. Environmental Protection Agency (EPA) conducted an extensive reassessment of its drinking water protection program. EPA initiated the reassessment in response to a number of issues which were being raised within the Agency, by a wide range of interested parties and by Congress, including:

- Concerns about priorities and direction of the program vis-a-vis the health risk reduction returns;
- Recognition of limitations on State and local resources to protect drinking water and the need to enable more effective use of these resources to focus on the highest risks to health;
- Demands on the program for regulations and other outputs without sufficient resources to complete them all;
- Need for improvement of the scientific and technical basis supporting the regulations; and
- Interest in positive, voluntary initiatives such as the Partnership for Safe Drinking Water, stakeholder consultation during rule development and community-based efforts to protect drinking water sources.

Many of these problems and issues arise from provisions in the Safe Drinking Water Act (SDWA) that require EPA to issue standards for 83 specific contaminants and for 25 new drinking water contaminants every 3 years after 1989. These combined requirements are proving impossible to meet within the mandated timeframes given the state of the underlying science and data as well practical limits on resources.

EPA highlighted these and other key issues in the Agency's "White Paper," *Strengthening the Safety of Our Drinking Water A Report on Progress and Challenges and An Agenda for Action*, released by Administrator Carol Browner on March 29, 1995.* The "White Paper" provided an overview of drinking water safety issues and identified five major agenda items for improving drinking water protection:

- Give Americans more information about our drinking water;
- Focus standards on the most serious health risks;
- Provide technical assistance to protect source water and help small systems;
- Reinvent Federal/State partnerships to improve drinking water safety; and
- Invest in community drinking water facilities to protect human health.

With the release of the "White Paper," EPA committed to undertake a comprehensive effort to redirect the drinking water program, including actions that the Agency can implement administratively or through joint efforts with States, water suppliers and other stakeholders. This effort also responds to the President's environmental reinvention initiative announced on March 16, 1995. (The relationship between the President's initiative and specific activities under the drinking water program redirection is discussed on pages 19-20.)

"EPA will continue to work with Congress to achieve balanced reforms that will strengthen the federal Safe Drinking Water Act. But we must also act now to provide the protection that will give the American people the safe drinking water they have come to expect."

Carol M. Browner
Administrator, EPA
March 29, 1995

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* Also in March 1995, EPA's Science Advisory Board (SAB), an advisory panel established by Congress, released *An SAB Report Safe Drinking Water Future Trends and Challenges*. The report identified significant trends (population growth impacts, public demand for better water, a changing contaminant profile, and changes in drinking water production and treatment) and recommended improved management of water resources, consolidation of smaller systems, accelerated research in risk assessment methodologies and establishment of an alert system for emerging pathogens. Two earlier SAB reports, *Reducing Risk Setting Priorities and Strategies for Environmental Protection* (Sept. 1990) and *Beyond the Horizon. Using Foresight to Protect the Environmental Future* (Jan. 1995), respectively ranked drinking water contamination as one of the highest environmental risks and recommended that the Agency give as much attention to avoiding future environmental problems as to controlling current ones, establish an early warning system for potential future risks and place greater emphasis on non-cancer human health risks.

The purpose of the drinking water program reassessment was to assist the Agency in

- Formulating comprehensive redirection objectives that can serve to guide Agency activities related to drinking water;

- Identifying and implementing high-priority activities that will maximize risk reduction;

- Realigning resources within the Office of Water's drinking water program at EPA Headquarters* to support as many of the activities as possible; and

- Utilizing improved coordination with other Agency offices and the Regions to support the redirection effort.

The Agency based the reassessment on extensive input provided by a wide array of stakeholders on specific parts of the program. This document describes the outcome of the reassessment process, including proposed resource realignments within the Office of Water's drinking water program at EPA Headquarters. EPA is seeking public comment by January 17, 1996, on this comprehensive program strategy prior to the Agency's efforts to finalize its plans for redirecting the drinking water program.

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* As referred to throughout this document, the Office of Water's (OW) drinking water program at EPA Headquarters comprises OW's Office of Ground Water and Drinking Water and certain resources within OW's Office of Science and Technology.

II. The Reassessment Process

EPA began the reassessment with a series of public meetings seeking input from a broad range of individual stakeholders. The meetings were held to solicit ideas, suggestions and options either for proceeding with specific activities related to the drinking water program or to serve as the basis for strategic decisions on program directions and resource allocations. The intent was to provide EPA with a wide array of viewpoints, ideas and concerns held by stakeholders. Meetings were organized around nine key subject areas.

For each subject area, EPA staff conducted one or more meetings from March through June open to all interested parties. The Agency received extensive input for all nine subject areas. Over 500 stakeholders (including individuals associated with States, water suppliers, local governments, consumer groups, environmental organizations, businesses and industries, academic institutions, the agricultural community, or other interests) attended meetings or provided written comments.

Subject Areas for Stakeholder Meetings

- Regulatory Reassessment
- Scientific Data Needs
- Health Assessment
- Treatment Technology
- Analytical Methods
- Focussing & Improving Implementation
- Source Water Protection
- Small System Capacity Building
- Consumer Awareness

Consensus was neither sought nor reached in any area, nor did stakeholders comment on relative priorities across the subject areas. Major themes that emerged from the meetings are noted in Appendix A.

Although there was not consensus among stakeholders, their views and suggestions were considered by senior drinking water program managers in EPA's Office of Water in formulating redirection goals and objectives and in developing recommendations for priority drinking water protection activities and resource allocations. The recommendations were provided to the Assistant Administrator for Water, who made the preliminary decisions presented in this document after consultation with the Deputy Administrator.

III. Redirection Objectives and Approaches

Objectives

In carrying out the reassessment, EPA recognized the need for a balanced program that targets priority issues and problems and develops cost-effective solutions. EPA identified four primary objectives to guide decisions under the redirection, each of equal importance to ensuring safe drinking water:

- Sound science and adequate data. A scientifically sound basis for each standard is critically important in determining and demonstrating the need for regulation and other Agency actions. A sound basis is needed for the health risk assessment, for assessment of contaminant occurrence and exposure, and for determination of effective treatment technologies, appropriate analytical methods and cost of compliance. Scientific research and data should be as complete as possible in each of these areas and the methodology and models used to assess the data need to be consistent, up to date and peer-reviewed. The ability to develop such comprehensive information is compromised by statutory requirements to issue large numbers of standards on unrealistic deadlines.

- Risk-based priorities for setting high-quality standards. Once data are collected and research results are available, they must be interpreted and analyzed to develop regulations that are genuinely needed to protect public health, are supported by the public and industry, and meet statutory requirements. The number of standards required under the SDWA, in combination with short statutory and court-ordered deadlines, make it difficult to focus exclusively on the highest risk contaminants and do the kind of data gathering and analysis that are necessary to clearly demonstrate a need for the regulations and generate public support. Meanwhile, stakeholders' expectations for thorough analysis and justification have risen at the same time that the Agency is working to develop a particularly complex set of rules related to microbial contaminants and disinfection by-products. More research, analyses and consultation are needed to ensure that each rule is not only defensible, but also satisfies these new expectations, statutory requirements and Agency policies. To maintain quality requires more resources per regulation. In identifying which rules should be developed first, the overriding consideration should be health protection, i.e., which rules can provide the most risk reduction.

- Strong, flexible partnerships with States and local governments in implementation. Much of the expertise for identifying drinking water problems and efficient, effective means for addressing them resides at the State and local government level. EPA has begun to forge stronger partnerships so that this expertise can feed into regulatory development more directly. Strong intergovernmental partnerships are also needed to ensure that public health is

protected through the implementation of existing drinking water standards * To help support a partnership approach, EPA also recognizes the need to provide flexibility so that States can implement drinking water regulations in a manner that maximizes the return on the resources invested.

- Community-based, effective source water protection. Preventing contamination directly enhances public health protection. Communities can develop a broad strategy that reflects local needs and conditions. With prevention as the foundation, a comprehensive approach to ensuring drinking water safety will ultimately be a less expensive means of attaining drinking water quality than monitoring and treatment alone. The Agency's role is to help communities, public water systems and other stakeholders understand this relationship and implement sound, workable source water protection plans.

Drinking Water Program Redirection Objectives

- Sound Science and Adequate Data
- Risk-Based Priorities for Setting High-Quality Standards
- Strong, Flexible Partnerships with States and Local Governments in Implementation
- Community-Based, Effective Source Water Protection

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* As noted in EPA's March 1995 "White Paper," estimated health benefits that are expected to accrue when existing standards are fully attained include reduced exposure to lead for an estimated 50 million people (including protection for 200,000 children against unacceptable blood lead levels); prevention of well over 100,000 cases annually of gastrointestinal and other illnesses attributed to microorganisms, reduced exposure for millions of people to dozens of contaminants that may cause illness including compromised reproductive capabilities, malfunction of vital organs, "blue baby" syndrome and nervous system damage; and over 100 excess cancer cases avoided per year.

Redirection Approaches

The redirection objectives suggest a number of basic changes in the Agency's approaches to carrying out the drinking water program, as indicated in Figure 1. In some instances, EPA has already begun to adopt new ways of doing business, for example by:

- Leveraging businesses and citizen groups to help protect source waters instead of focussing exclusively on State and local agencies;

- Using regulatory negotiations to facilitate stakeholder involvement in rule development for disinfection/disinfection byproducts;

- Emphasizing voluntary efforts such as the Partnership for Safe Water* that may achieve public health protection results more quickly while also reinforcing regulatory program efforts; and

- Working with States to reformat existing regulations for easier understanding.

EPA is also supporting increased State flexibility through the partnership concept to devise State-specific approaches to carry out broad program objectives. This change is reflected in the Agency's decreased emphasis on State oversight and increased emphasis on compliance assistance activities.

The redirection proposals contained in this document do not signify a lessening of the Agency's commitment to ensure compliance with current National Primary Drinking Water Regulations (NPDWRs). The NPDWRs provide a base level of drinking water public health protection throughout the United States. EPA's redirection of the drinking water program does not alter the legal obligations of public water systems to comply with regulations promulgated under the Safe Drinking Water Act (SDWA). EPA has, since the reorganization of its Office of Enforcement and Compliance Assurance (OECA), worked to balance traditional enforcement, compliance assistance and other innovative approaches to achieve compliance.

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* The Partnership for Safe Water is an innovative, voluntary effort by water suppliers to optimize existing drinking water treatment systems in order to enhance the potential to prevent the entry of *Cryptosporidium, Giardia* and other microbial contaminants into treated water. Approximately 300 utilities have expressed interest in participating in the Partnership, which was announced in March 1995. EPA is working with key industry and State associations to promote the Partnership and is providing necessary technical assistance.

DRINKING WATER PROGRAM TRANSFORMATION

OLD APPROACHES	NEW APPROACHES
Develop Many New Regulations	Fewer New Regulations (Priorities Based on Risk)
Measure Activity	Measure Environmental Results
Source Water Protection/ PWSS Program Separate	Integrate Prevention & Implementation
Extensive Oversight of Regional/State Programs	Empowerment/ State Partnerships
Rely on Mandates To Achieve Public Health Protection Goals	Balance Mandates & Voluntary Approaches (e.g., Reg Neg, Partnership for Safe Water, Community Source Water Protection)
Intermittent Coordination with Stakeholders	Early, Comprehensive Stakeholder Involvement
"Do It" Ourselves	Leverage Stakeholders/Energize Communities
Less Flexibility	More Flexibility (e g., Targeted Monitoring)
Detailed Program Reporting	Reporting Simplified
Paper & Travel Intensive	Computer & Telecommunication Intensive
Technical Jargon	Plain English

FIGURE 1

IV. Resource Choices

Overview

As part of the redirection effort, EPA's Office of Water at the Agency's Headquarters is undertaking a realignment of resources that are currently available within its drinking water program to support the four primary objectives discussed in Section III. The resulting recommendations consist of a set of high-priority activities that can be accomplished at Headquarters, described on pages 11 - 17. EPA has not yet fully addressed the redirection of Regional drinking water/ground water activities or expanded coordination on activities with other EPA offices such as the Office of Research and Development (ORD) and compliance programs in OECA.

In developing the recommendations, the Office of Water attempted to balance the redirection's four critical objectives. The Office also gave special consideration to activities that require extensive Headquarters involvement because of their standard-setting or national policy nature.

It became apparent over the course of this analysis that it will not be possible for the Office of Water's drinking water program at Headquarters to fully address all four objectives, given the current distribution of drinking water program resources.* **To adequately address priorities related to sound science, standard-setting and chemical monitoring reform, it is necessary for the Office of Water to scale back or defer other critical activities presently carried out at Headquarters related to source water protection and to implementation of the Public Water System Supervision (PWSS) program.**** This is the case even after resources currently dedicated to standard-setting are redirected to focus solely on the highest-priority rules. Thus, the breadth of standard-setting activities would be reduced as well.***

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* The recommendations described in this proposal assume that resources for the Office of Water's drinking water program will remain at FY 1995 levels and do not deal with potential FY 1996 Agency-wide reductions currently being debated.

** These proposed disinvestments will <u>not</u> affect grants to States under the PWSS program -- although they will impact EPA's ability to provide technical assistance and training to help States and water suppliers meet Safe Drinking Water Act objectives.

*** The Office also identified a preferred option that assumes sufficient investment in all priority activities to fully support each of the redirection's four objectives, as indicated in the last column of Figure 1. This would, however, require resources in addition to those currently available within the Office of Water's drinking water program and/or a redirection of activities carried out by Regional resources and some related EPA program offices.

In addition to reductions in the source water protection and PWSS programs, action will be possible on only some of the many suggestions put forth by stakeholders for new or increased efforts across all four objectives. The Office of Water will be unable to respond, for instance, to requests that EPA comprehensively redesign the analytical methods approval process, enhance efforts to support source water protection and develop a new consumer awareness initiative.

The Agency's intention is that the redirection effort will ultimately result in stronger science and improved approaches to standard-setting without compromising critical efforts to prevent pollution of drinking water sources and to ensure the efficient implementation of existing safety standards. **Through the public comment process for this proposal, EPA is seeking stakeholder input on the following questions:**

- **Do the primary objectives of sound science, risk-based standard setting, implementation partnerships and source water protection, as described in Section III, provide an appropriate basis for redirecting the drinking water program?**

- **Has the Agency made the right choices for utilizing Office of Water resources and do these choices provide an appropriate balance among the four redirection objectives?**

- **Are there other ways that Office of Water resources could be utilized to more effectively and efficiently support the four objectives?**

- **How can the expertise and capabilities of other EPA offices, the Regions, the States, water suppliers and other stakeholders be brought to bear to address unmet national needs?**

Key Decision Factors

As part of the redirection, EPA is seeking to prioritize the development of drinking water safety standards based on the highest potential for risk reduction. The proposed realignments within the Office of Water would support this approach by redirecting resources to develop new safety standards for certain high-priority contaminants -- primarily microbes and disinfection byproducts. Drinking water program resources would also be redirected to strengthen the scientific basis for selecting contaminants for future regulation based on an improved understanding of health effects, costs and occurrence in drinking water.

Standards for microbial contaminants and disinfection/disinfection byproducts (M-DBP) were judged to offer the greatest risk reduction potential relative to other

rules that are under development The development of the M-DBP standards will require significantly greater levels of investment than previous estimates have indicated. Thus, allocation of sufficient resources to ensure timely development of a defensible set of rules for these high-priority contaminants, as well as to strengthen the scientific foundations for future standard-setting, will force major resource shifts within the Office's drinking water program.

Regional and State Impacts

The redirection of the drinking water program is coming at a time when EPA's Regional offices are undergoing significant changes in their relationships with States and in their own internal operations. The Agency as a whole and the Regions in particular are rethinking and refining EPA's role with respect to oversight of State programs. These shifts reflect Agency-wide efforts to provide States and other stakeholders with greater flexibility to measure progress in terms of public health and environmental protection outcomes, rather than strictly programmatic outputs. EPA's Regional offices are concurrently engaged in major reorganizations across all of their programs in response to government-wide streamlining efforts.

It is the Agency's intention that the redirection goals and objectives presented in this document will serve to guide changes in Regional, as well as Headquarters, implementation of the drinking water program. Resource realignments within the Office of Water at Headquarters will also directly impact the Regions, as well as States and other stakeholders, as Headquarters will rely more heavily on Regional, State and local efforts to carry out source water protection and implementation activities.

In addition, the Office of Water will explore possibilities with the Regions to identify specific opportunities to support the redirection by taking the lead on certain national priority activities where the Region may have expertise or the potential to develop expertise.

OFFICE OF WATER (HQ) INVESTMENTS AND DISINVESTMENTS

BASE -- Resource levels the same as in FY 1995
MORE -- Increase in resources over FY 1995 levels
LESS -- Decrease in resources from FY 1995 levels
DEFER -- Allocation of resources postponed

OFFICE OF WATER (HQ) ACTIVITIES	Current (FY 95)	Redirected (Proposed beginning in FY 96)	Preferred (additional resources required)
Contaminant Occurrence Data (for Drinking Water Priorities List)*	BASE	MORE	MORE
Risk Assessment Methodologies*	BASE	BASE	MORE
Cost-Impact Analysis*	BASE	MORE	MORE
Treatment Technology for Small Public Water Systems*	BASE	MORE	MORE
Standards/Risk Characterization for Microbes & Disinfection By-Products. - Information Collection Rule (ICR)* - Disinfection/Disinfection By-Products Rules I + II* - Enhanced Surface Water Treatment Rules I + II* - Ground Water Disinfection Rule	BASE	MORE	MORE
Other Standards/Risk Characterizations: - Radon & Other Radionuclides - Arsenic - "Phase 6B" chemicals - Sulfate - Aldicarb - Nickel - Atrazine (Radon & other radionuclides, arsenic, Phase 6B, and sulfate are currently under court-ordered schedules that will need to be extended)	BASE	DEFER (Arsenic research maintained; some Health Advisories; Risk Char. for total triazines, inc. atrazine)	DEFER (Do regs. for radon & a few other contams. based on sound occurrence/risk analysis; Arsenic research maintained; more Health Advisories; Risk Char. for total triazines, inc atrazine)
Partnership for Safe Water*	BASE	BASE	MORE
Revise Requirements for Chemical Monitoring for Public Water Systems*	BASE	BASE	BASE
Public Water System Supervision Program (includes implementation support)	BASE	LESS	MORE
Safe Drinking Water Information Systems*	BASE	LESS	MORE
Wellhead Protection Program*	BASE	LESS	BASE
Underground Injection Control (UIC) Program	BASE	LESS	BASE
Comprehensive State Ground Water Protection Programs (CSGWPP)	BASE	LESS	BASE
Ground Water Indicators (Data Collection & Analysis)	BASE	LESS	BASE
Source Water Protection for Surface Waters*	BASE	LESS	MORE
Standards for Total Triazines*	--	--	NEW
Streamline the Laboratory Analytical Methods Approval Process*	--	--	NEW
Laboratory Performance Evaluation Redesign*	--	--	NEW
Consumer Awareness Initiative*	--	--	NEW

* Asterisks indicate broad stakeholder support. (EPA did not ask stakeholders about the UIC and CSGWPP programs, ground water indicators, and various aspects of the PWSS program.)

FIGURE 2

Office of Water, EPA Headquarters
Drinking Water Resources*

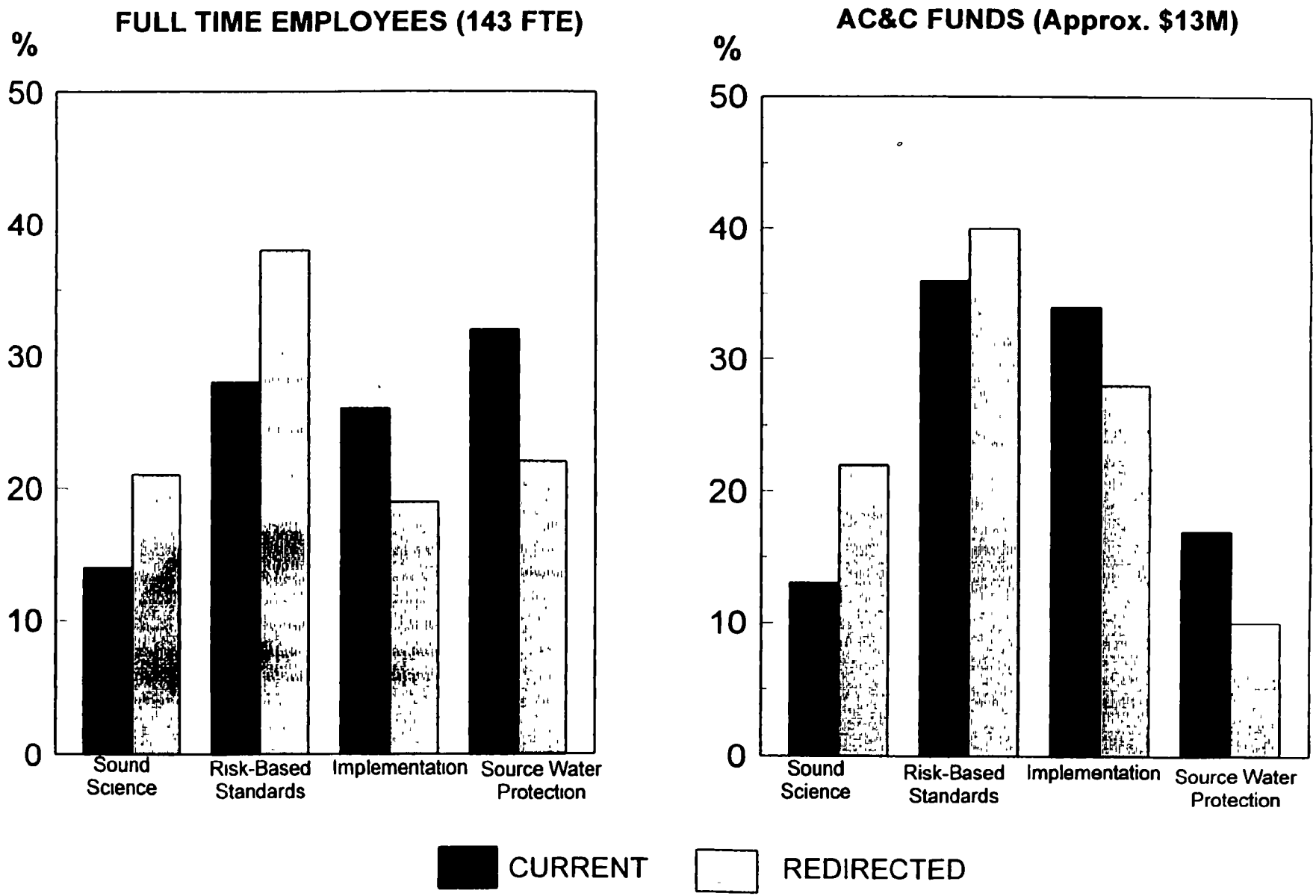

FIGURE 3

* Based on FY1995 Resource Levels

V. *Office of Water Investments and Disinvestments*

The following pages describe specific investments which the Office of Water is proposing in support of the redirection's four primary objectives. Also described are the corresponding disinvestments that the Office must make in other areas. The disinvestments would primarily affect the PWSS program, source water protection activities and rule development other than the M-DBP rules. The Agency will be discussing with the Regions and potentially other EPA offices such as ORD and OECA how they might be able to implement some of the disinvested activities on which they have expertise and capability.

Figure 2 shows which Office of Water activities are targeted for increased investment at Headquarters and which are targeted for disinvestments. As reflected in Figure 3, the Office of Water's realignments would involve shifts in both the number of full-time personnel (FTE) and the amount of extramural (AC&C) funds allocated to specific activities.

In addition to the activities noted under each of the redirection objectives below, the Office of Water will continue to carry out at current levels a number of activities that cut across all four objectives of the redirection. These include facilitating the deliberations of the Congressionally-established National Drinking Water Advisory Council; operation of the Safe Drinking Water Hotline; and operation of the Drinking Water Resource Center. The Office will also continue to ensure internal coordination on small system issues that may arise across the redirection's objectives, as well as continuing in partnership with the States coordination and outreach efforts related to small system capacity building.

- **Sound Science and Adequate Data**

Occurrence Data: Increased investments in this area will improve contaminant occurrence data used in developing the Drinking Water Priorities List (DWPL) to enable EPA to more accurately identify contaminants which warrant future regulation based on actual or likely risks to public health. EPA will undertake a concerted effort to better use existing information. Existing data related to the levels and locations of contaminants present in drinking water supplies will be collected from Federal agencies, States, water systems and others. EPA will concurrently develop approaches for the sound integration of occurrence data from different sources. The resulting DWPL will form the basis for decisions on future safety standards and/or health advisories. **DWPL development will include consideration of contaminants which EPA is currently proposing to defer for purposes of developing standards.** In addition to improved contaminant selection, better occurrence data should help to

1) provide a stronger foundation for regulations and guidance; 2) assist in targeting source water protection efforts; 3) support more meaningful risk estimates and risk communication; 4) support improved cost models; and 5) provide a sound basis for the establishment of explicit criteria for monitoring waivers.

Risk Assessment Methodologies: Many stakeholders encouraged EPA to use the best available science and improve the methodology for estimating risks posed by drinking water contaminants. EPA will undertake an effort to update the scientific approach used to estimate risks associated with contaminants so as to better identify drinking water contaminants that do not present high risks of adverse health effects and to better characterize variability and uncertainty in risk estimates. Use of newer methodologies is also expected to reduce the uncertainty in the risk estimates. EPA will develop better approaches for characterizing the variability and uncertainty in risk estimates, particularly dose-response estimates that are used to estimate the health benefits of proposed Maximum Contaminant Levels (MCLs) for drinking water contaminants.

Cost-Impact Assessment: EPA will also revise and upgrade its economic models for drinking water to better account for cost variability among water systems (e.g., system size, design and customer mix), to enable consideration of a number of different cost factors (e.g., better consideration of transaction costs of compliance to States and utilities) and to make better use of existing information. EPA will use the improved models to develop sensitivity analyses and allow for the consideration of a broad range of alternatives in setting standards.

Treatment Technology: The emphasis in this area will be on assembling information to improve implementation of drinking water regulations. One of the major problems in implementing regulations has been the lack of simple, inexpensive technology for small system compliance. EPA is working with the National Academy of Sciences to produce a report on new ways to help small systems produce safe water and will pursue efforts to specify an acceptable range of small system technologies for compliance and creation of a third-party program for verification of equipment performance. The Agency will also explore guidance for the full range of technologies applicable to various contaminant situations in lieu of a contaminant-by-contaminant approach. This total treatment concept is intended to help utilities invest with improved confidence in technologies to meet current and future safety standards. It will also serve as the model for future regulation development.

- **Risk-Based Priorities for Setting High-Quality Standards**

Standards/Risk Characterizations for Microbial Contaminants and Disinfection Byproducts (M-DBP): In a 1993 regulatory negotiation, EPA and a negotiating

committee of interested parties agreed to a series of actions designed to better understand and control risks from disinfection byproducts and pathogens. The action plan consists of interim standards to reduce current risk, a major research and information gathering effort to better understand the risks and the risk tradeoffs between control of byproducts and pathogens, and long-term rules to maximize risk reduction. Interim standards have been proposed; an Information Collection Rule to gather occurrence and treatment information is about to be promulgated; and a research effort to gather health effects, analytical methods, and treatment information, jointly funded by EPA and industry, is underway.

Significant new investments, resulting from resource realignments in the Office of Water, to develop these standards could enable the Agency to finalize interim standards in 1999 and the long-term rules in 2001 -- although without additional resources (beyond those provided by the realignment) the risk characterizations for microbes and disinfection byproducts will be less complete than preferred. Also, as another key part of this effort, EPA's Office of Research and Development (ORD) has (1) proposed as part of the FY 1996 President's Budget a $3.1 million increase in the level of funding for extramural research concerning disinfection byproducts and microbes and (2) developed as part of its grants program for FY 1996 a special topic area on disinfection byproducts and microbes in drinking water with emphasis on health effects, method development, exposure and risk assessment.

The total M-DBP package is expected to consist of 6 rules:

- Information Collection Rule (ICR);
- Enhanced Surface Water Treatment (ESWTR) Rule, Phase I
- ESWTR, Phase II
- Disinfection/Disinfection Byproducts (D/DBP) Rule, Phase I
- D/DBP Rule, Phase II
- Ground Water Disinfection Rule

Other Standards/Risk Characterizations: Radon, other radionuclides, arsenic and sulfate are among the 83 contaminants targeted by Congress in the 1986 SDWA amendments for regulation. Standards for radon, other radionuclides, and sulfate have been proposed. Health effects and treatment technology research is needed on arsenic to reduce the uncertainty in the analysis before proposing a rule.

Except for developing and overseeing the implementation of an arsenic research plan, resources are not available under the redirection proposal to pursue these regulatory actions or any other rule development (e.g., Phase VI-B contaminants) other than the M-DBP rules for the next several years. EPA will need to obtain extensions of the current court-ordered schedules reflecting these new priorities. In addition,

work on regulations for aldicarb and nickel that were finalized but subsequently stayed will be deferred for several years. Current risk characterization efforts for some contaminants such as total triazines (which were generally ranked by stakeholders as medium-high priority for rule development) will continue, but there will be no rule development for the time being.

For some contaminants identified on the DWPL or deferred for regulation, EPA will (depending on resource availability) develop Health Advisory Guidance Documents as needed to respond to local needs and concerns. Such Health Advisories will provide guidance that may serve to meet local needs in lieu of a standard. They will also help determine if there is sufficient data to set a standard. Contaminants for which EPA will issue Health Advisories include cyanazine, aldicarb, arsenic and sulfate.

- **Strong, Flexible Partnerships with States and Local Governments in Implementation**

Partnership for Safe Water: The Office of Water will continue to promote and provide technical assistance to this voluntary effort by water suppliers to optimize existing drinking water treatment systems in order to enhance the potential to prevent the entry of *Cryptosporidium, Giardia* and other microbial contaminants into treated water. The Office will also continue to coordinate with key industry and State associations to encourage water suppliers to participate in the Partnership. Volunteer participation in the Partnership is limited initially to systems filtering surface water and serving more than 10,000 people. It is anticipated that this innovative program could be a prototype for other voluntary, cooperative drinking water protection efforts.

Revised Requirements for Chemical Monitoring for Public Water Systems: EPA will propose the simplification, consolidation and streamlining of the chemical monitoring requirements to enable more efficient use of State and local resources and to provide States with expanded flexibility to tailor monitoring requirements to local circumstances. This effort would be geared to improving the cost effectiveness of small system monitoring requirements and the safety of drinking water from chemical contamination by (1) providing the flexibility for state and local jurisdictions to reallocate their resources to focus on actual contamination and identifiable risks of contamination; and (2) encouraging the initiation of source water assessments and the implementation of source water protection measures.

Public Water System Supervision (PWSS) Program: In addition to revising the chemical monitoring requirements, EPA's Office of Water will continue to meet its fundamental obligations in administering the PWSS program. These include completion of the Public Water System Infrastructure Needs Survey; maintaining

essential communication and coordination (including management agreements) with EPA's Regional offices and the States, awarding and managing grants as appropriated by Congress to States and others, and responding to requests under the Freedom of Information Act. In addition, the Office of Water will continue to coordinate on drinking water issues with EPA's Office of Enforcement and Compliance Assurance Activities and to coordinate on lead issues with other parts of the Agency. The Office will also continue its ongoing efforts to modernize and update its data management system (SDWIS) and to revise the State Program Priorities Guidance in partnership with States and Regions in order to enable States to direct their resources towards activities that will achieve the greatest risk reduction.

Certain technical assistance and other activities will be discontinued due to resource realignments within the Office of Water's drinking water program. Office of Water staff will no longer provide direct support to States for PWSS program implementation, including training related to sanitary surveys and rule implementation (e.g., Surface Water Treatment Rule, Total Coliform Rule). Nor will the Office respond routinely to individual Regional and State inquiries and requests for assistance which arise on a range of program issues. Other disinvestments include technical assistance for Indian programs; assistance to the Regions in implementing both the chemical monitoring revisions and the revised State Program Priorities Guidance; and various field projects.

Other activities, although continued, will be considerably reduced. These include a 50% reduction in early involvement meetings held to obtain State input on regulation and policy development for a variety of issues and decreases in joint information management policy development and assistance to States. Headquarters staff from the Office of Water will generally participate in fewer meetings, conferences and other forums for exchanging information and building partnerships under the PWSS program with States and water suppliers than in the past.

To provide technical support to the States for implementation of the PWSS program, the Office of Water will continue to work with EPA's Office of Research and Development (ORD) and the Regions to administer the drinking water laboratory certification program until the National Laboratory Accreditation Program (NLAP) becomes operational. Due to resource constraints, the Office of Water cannot carry out comprehensive efforts to streamline the analytical methods approval process and redesign the performance evaluation study program as requested by stakeholders. The Office will instead (1) attempt incrementally to deal with the methods approval process as part of doing methods updates and (2) provide for limited drinking water program staff participation in a joint effort with ORD across a number of Agency programs to redesign and externalize the performance evaluation sample program.

Safe Drinking Water Information Systems (SDWIS): EPA views the SDWIS effort as integral to the overall success of the drinking water program and will maintain its commitments in partnership with the States to develop and utilize this new, upgraded national drinking water data base. Although resources will be somewhat reduced from FY 1995 levels, the Office of Water will ensure that core business system development continues to move forward during FY 1996 and beyond. The Office will also continue to provide training and assistance with installation to States. SDWIS is being designed for States' use to track public water systems' compliance with SDWA requirements and to identify public health threats that need to be addressed.

- **Community-Based, Effective Source Water Protection**

Wellhead Protection (WHP) Program: EPA will continue to promote the Wellhead Protection Program as the Agency's flagship source water protection effort and will work with a variety of partners to provide education and technical assistance to support local implementation -- although at a lower level of investment than in FY 1995. This decrease means that the Office will be less able to facilitate efforts to develop national partnerships and leverage groups of stakeholders to protect local drinking water sources. (Current estimates indicate that approximately 4,000 of the 60,000 communities served by community water systems in the U.S. have implemented complete and sustainable prevention programs to protect their drinking water sources.)

Underground Injection Control (UIC) Program: As part of the redirection effort, the UIC program has re-ordered its activities to direct resources to higher priority needs. Headquarters efforts related to the more mature Class I and Class II well programs, which are in large measure implemented by the Regions, are being de-emphasized to enable the Office of Water to focus resources on the Class V shallow industrial well program, which has the greatest potential to affect local drinking water supplies. EPA will complete the Class V rule that is currently underway and will develop various essential program guidances, although resource limitations within the Office of Water will delay the provision of all necessary efforts to support State implementation of a Class V strategy (of which the rule is a small component). The Office will carry out partial efforts to reduce and streamline regulations and ease program burdens for the entire UIC program.

Comprehensive State Ground Water Protection Programs (CSGWPP): EPA will continue to promote a unified approach to ground water protection, with an emphasis on preventing pollution of drinking water sources, through Comprehensive State Ground Water Protection Programs. Headquarters investment in this EPA/State partnership will, however, be reduced to minimal levels, with Headquarter's role limited to occasional reviews of State and Regional recommendations for moving the

CSGWPP partnership forward. This will reduce the Agency's ability to foster flexibility for States in the operation of Federal ground water-related programs, which in turn is likely to impede and limit States' efforts to focus resources on protecting high-priority ground water used by public water systems.

Ground Water Indicators: Office of Water efforts to incorporate State and local ground water data in the *National Reports to Congress* will continue, although at reduced levels. The Office's capability to develop targeted pollution prevention techniques to help communities protect their ground water will also be reduced. The Office of Water will not develop additional environmental indicators. (EPA has identified a first set of indicators for nitrates and several industrial chemicals. Additional indicators would enable communities to measure ground water quality under a variety of local conditions.) The national Safe Drinking Water Information System (SDWIS) will not track local source water protection programs to report community progress.

Source Water Protection for Surface Waters: In FY 1995, EPA Headquarters undertook a new initiative to better support local efforts to prevent contaminants from entering lakes, rivers and streams that serve as drinking water sources for approximately half of the U.S. population. In order to both accommodate overall drinking water program redirection needs and maintain a meaningful baseline level of investment in its other, more developed source water protection efforts, Headquarters will disinvest in this focused surface water protection initiative, thereby limiting efforts in this area mainly to those that others may choose to pursue under watershed protection approaches.

VI. Relationship of the Redirection to Other Efforts

Safe Drinking Water Act Reauthorization

Safe Drinking Water Act reauthorization has been one of the Administration's top environmental legislative priorities for over two years. In October 1993, EPA announced 10 recommendations for reauthorization of the Act. While the shape of specific proposals has changed over time, the general principles have remained the same: greater regulatory flexibility coupled with stronger "preventive" approaches. Legislation incorporating EPA's recommendations passed both the Senate and House last year and, although a compromise was never reached, those bills are expected to form the foundation for SDWA consideration in the 104th Congress.

Many widely supported changes to the SDWA are consistent with EPA's redirection effort. For instance, among regulatory changes, Congress is expected to eliminate the requirement for EPA to establish regulations for 25 additional contaminants every 3 years. As part of a risk-based rulemaking process, Congress is expected to strengthen public participation and science requirements for future regulations -- two changes embraced in the redirection effort.

The Administration also supports a new State Revolving Fund to help improve drinking water treatment infrastructure, monitoring flexibility, new affordability variances for small systems, use of special small system technology, source water protection, operator certification, improved consumer information and new State strategies to build water system capacity. EPA's redirection priorities reflect likely reauthorization priorities -- to the degree funding is available and EPA has discretion under current law.

Reauthorization is likely to create flexibilities for both EPA and States to carry out activities that provide the greatest health protection. Funding constraints and heavy program demands, however, may not be resolved by reauthorization. In fact, EPA may again need to identify priorities among a range of new mandatory duties which, in the end, are designed to improve program flexibility and State decisionmaking.

Ongoing Litigation

As discussed earlier, one of the fundamental problems currently confronting the drinking water program is the Safe Drinking Water Act (SDWA) requirement that EPA issue safety standards for 25 new contaminants every 3 years. The SDWA also requires EPA to issue standards for 83 listed contaminants, most of which have been completed.

These requirements, instituted by Congress as part of the 1986 SDWA amendments, have proved impossible to meet given the state of the underlying science and data as well as the drinking water program's resource limits. EPA is increasingly beset by concerns from both inside and outside the Agency that its efforts to meet all of the statute's remaining standard-setting requirements are detracting from the development of soundly analyzed, well-supported safety standards for the highest-risk contaminants, such as microbes.

Congress has been working over the last several years with EPA, the States and other stakeholders to reauthorize the SDWA. It is widely expected that, as a result of reauthorization, the requirement for "25 every 3 years" will be eliminated, helping EPA to focus its standard-setting efforts on risk-based priorities -- a change the Administration has strongly recommended.

EPA is currently under court order to comply with the SDWA in issuing safety standards for a number of drinking water contaminants. These include seven of the 83 contaminants listed in the 1986 amendments, the first round of 25 additional contaminants and the ground water disinfection rule.

The parties to the litigation in which the court-ordered schedules were established have agreed to interim extensions of these schedules while EPA completes the reassessment of the drinking water program and clarifies the resources that will be available. Thereafter, EPA will begin discussions with the Plaintiffs on revised schedules. EPA will be seeking extensions of the current court-ordered schedules to reflect the Agency's new priorities.

Environmental Reinvention

On March 16, 1995, President Clinton and Vice-President Gore announced an Administration initiative to reinvent environmental protection as part of a broader government reform effort. The environmental reinvention features 25 specific High Priority Actions across a number of EPA's programs. These actions are intended to substantially improve the existing regulatory system and move the nation towards a new and better environmental management system for the 21st century.

The President's reinvention initiative incorporates several efforts which are also key to the Agency's Drinking Water Redirection Plan, including:

- Establishing priorities and new schedules for setting national drinking water standards based on health risks and sound science;

- Supporting the Partnership for Safe Water, which represents a new level of cooperation among EPA, States and stakeholders to protect public health; and

- Simplifying and streamlining monitoring requirements for chemical contaminants and allowing further tailoring of monitoring to local contaminant threats.

> *"Do we need more common sense and fairness in our regulations? You bet we do. But we can have common sense and still provide safe drinking water. . And we ought to do it."*
>
> President Clinton
> State of the Union Address
> January 24, 1995

The President's environmental initiative also includes Agency-wide goals to reduce aggregate paperwork burdens by 25% and reporting frequencies by 50%. EPA expects that contaminant monitoring reform will contribute to the Agency's efforts to meet these goals. The Office of Water is assessing additional suggestions solicited from stakeholders at a public meeting held in August. The Office is also preparing a regulatory proposal to reduce paperwork burdens and reporting frequencies for the Underground Injection Control Program based on written input that was solicited from stakeholders in June.

Government-Wide Streamlining

Consistent with the National Performance Review (NPR), President Clinton, in September 1993, issued a series of Executive Orders with the intention of reinventing the practices of the Federal government focusing primarily on efficiency, streamlining and creating a "government that works better and costs less."

The Executive Orders addressed downsizing and flattening the government bureaucracy, reducing regulatory burdens and establishing a new "customer service" standard. Specifically, the Orders require:

- Reducing the number of supervisors by 50% in five years;

- Reducing overcontrol and micromanagement that now generate "red tape" and hamper efficiency;

- Cost savings, improvement in the quality of Government service, and raising the morale and productivity of departments and agencies;

- Elimination of internal management regulations that are not required by law by

not less than 50% within three years; and

- Establishment of a Federal government customer service standard equal to the "best in the business".

The Office of Water's drinking water program is reevaluating its present organization in light of the requirements of the Executive Orders, stakeholders' concerns and the new priorities and redirection resulting from this posed reassessment. In addition, reorganization concerns must factor in changes to program priorities that may be reflected by reauthorization of the Safe Drinking Water Act (SDWA) and any revisions to the current court-ordered deadlines for standards development.

"We view these performance reviews as an opportunity for EPA to strengthen its role as a national and world leader in preparing for the environmental challenges that lie ahead in the 21st century while meeting the pressing needs of today. Our Agency is exploring avenues for change - to work better and smarter to deliver quality results at reduced costs. Our aim is to treat citizens as customers, improve the service and delivery of our programs, and eliminate waste and inefficiency."

"Improving Environmental Protection through Empowered Employees - Streamlining the U.S. EPA", November 1, 1993

EPA has temporarily put a hold on all reorganization efforts until resource implications of the FY 1996 budget can be determined. At this time, EPA is uncertain when the FY 1996 Appropriation will be signed, and, if it is, what the resultant impact will be on the various Agency programs, including the extent of Reduction-In-Force procedures that may be mandated.

VII. Next Steps

EPA is seeking public comment by January 17, 1996, on its proposals to redirect the drinking water program, including resource realignments within the Office of Water. The Agency will consult during this comment period with the National Drinking Water Advisory Council (NDWAC) to obtain the Council's recommendations on the proposals. Results of the reassessment will also be included in future discussions with the litigant.

The Agency will finalize its redirection plan on completion of negotiations with the litigant and after considering NDWAC's recommendations and other stakeholder comments. Realignments within the Office of Water's drinking water program at Headquarters that reflect preliminary redirection decisions will, to the extent feasible, begin in FY 1996. Once finalized, EPA's plan will be integrated with ongoing efforts to reorganize the Agency's Office of Ground Water and Drinking Water. The Office of Water will in the meantime work closely with the Regions to determine how the Regions can support the Agency's drinking water program redirection objectives and to identify specific opportunities for Regions to step into national leadership roles.

The Agency is committed to the Administration's goals of reinventing government. Along with SDWA reauthorization and revisions to court-ordered schedules, the reorganization, the streamlining and the redirection efforts should be in place and operating during FY 1996. In the meantime, the Agency will continue to work with Congress towards a balanced reauthorization of the SDWA that would also support the objectives of the redirection proposal.

APPENDIX A

STAKEHOLDER MEETING SUMMARIES

1 Regulatory Reassessment

For regulation development, stakeholders generally rated as high-priority (i.e., offering the maximum potential for risk reduction) six rules related to microbial contaminants and/or disinfectants/disinfection byproducts (hereafter referred to as the M-DBP rules) and an update of analytical methods. Control of cyanazine was generally rated as medium-high, while the ground water disinfection rule, radon (at a level of 1,000 pCi/l or higher) and aldicarb were given medium priority. For research or information development, stakeholders generally rated arsenic and total triazines as medium-high priority, and corrosion control, the total coliform rule and MTBE as medium priority.

Major themes which were raised during the discussion included: 1) good occurrence data and a computerized data base to house them are essential to demonstrate the need for a national drinking water regulation; 2) OW needs to coordinate better with other parts of EPA and other government agencies to ensure a consistent regulatory approach; 3) treatment technologies used to implement drinking water regulations need to complement one another; 4) updated analytical methods are critical to effective rule implementation; 5) microbiological and other acute contaminants are more important to regulate than contaminants posing chronic effects; 6) distribution system contamination merits more attention; and 7) contaminants with localized occurrence don't warrant national regulation.

2. Scientific Data Needs

Stakeholders underscored the need for updated, extensive occurrence data and treatment technology cost data that are peer-reviewed before being incorporated into regulatory decision-making.

3 Health Assessment

Stakeholders commented on a number of scientific issues that are currently being debated. These included whether EPA should set the MCLG at zero for carcinogens and microbial contaminants, how to estimate benefits for carcinogens and non-carcinogens, whether to use risk characterization as a key component of decision-making, methodology for conducting microbial risk assessment, and acceptable levels of microbial risk. On the MCLG of zero issue, most stakeholders objected to a policy of zero across the board and said it should be a case-by-case decision, depending on the potency and threshold nature of the risk. There was broad support of the use of risk characterization considerations in decision-making.

4. *Treatment Technology*

Stakeholders noted needs for 1) establishing standardized technology performance testing protocols and 2) a third-party database of verified treatment performance data to help increase acceptance of package technologies for small systems and to possibly reduce State specific pilot testing requirements. Stakeholders also commented that EPA should define Best Available Technology (BAT) for small systems, that small system BAT should be product-specific and that point-of-use devices should be considered as a means of compliance for systems serving fewer than 500 persons. A number of stakeholders also recommended that the Agency increase its efforts to coordinate research with industry.

5 *Analytical Methods*

Streamlining methods approval was generally identified by stakeholders as the highest priority within this subject area. Most stakeholders wanted to simplify the approval process and recommended increased flexibility for making minor technical changes in the analytical methods themselves. Many stakeholders also endorsed rapidly approving newer versions of methods, including those issued by consensus methods organizations such as Standard Methods. Stakeholders expressed differing views about instituting a performance based methods system. Centralized EPA management of methods-related programs was endorsed by many to maintain program consistency. Some stakeholders also voiced support for use of immunoassays as screening tools. Revisions to the laboratory certification program were suggested, as were approaches to the way the Agency defines and uses detection and quantitation in contaminant measurement. Finally, many stakeholders supported inter- and intra-agency coordination of methods-related issues as a vehicle to enhance data comparability and increase program effectiveness.

6 *Source Water Protection*

Stakeholders identified needs for expanding communications and joint efforts among source water protection partners. Many also emphasized the need to establish a core of communities with active, comprehensive local prevention programs and to provide mechanisms for them to work together and to help other communities move forward with source water protection.

7 *Focussing and Improving Implementation*

Stakeholders generally appeared to support EPA's intentions to revise the State Program Priorities Guidance which helps States allocate their drinking water implementation and enforcement resources to the highest health risk protection and prevention activities. Most stakeholders also strongly supported EPA's intentions to revise the organic and inorganic contaminant monitoring scheme to provide States more flexibility to tailor monitoring to local contaminant threats.

8 Small System Capacity Building

Stakeholders generally viewed small system capacity building as an important issue that is best addressed at the State level taking local factors into consideration. Most viewed EPA's role to include providing information, guidance, incentives and technical assistance to help States address small system capacity concerns. There was support for continuing EPA's training and technical assistance efforts.

9 Consumer Awareness

Stakeholders expressed broad support for improved public information and notification on the quality of the nation's drinking water. It was noted that the information needs to be balanced, accurate and in a user-friendly format. Suggestions for ways to provide information included annual reports, cooperative education and awareness initiatives, partnerships with the private sector, and increased use of the media.