

Date Signed: July 10, 1998

MEMORANDUM

SUBJECT: Revised Safe Drinking Water Information System (SDWIS) Inventory Reporting Requirements—Technical Guidance

FROM: Robert J. Blanco, Director
Implementation and Assistance Division
Office of Ground Water and Drinking Water

TO: Addressees

This memorandum provides your staff with the detailed technical guidance needed to implement the changes to the SDWIS/FED reporting requirements. These changes result from the data sharing process that was begun over three years ago to analyze EPA data needs and existing reporting requirements. These changes were recommended by the Data Sharing Committee (DSC) and received considerable state and regional input through this process. These recommendations were also reviewed and concurred on in substance by the ASDWA/EPA Data Management Steering Committee, which also has EPA regional and state representatives.

In April 1997 Cynthia Dougherty sent an early notice of new reporting requirements and a fact sheet that summarized the tentative changes to the SDWIS inventory reporting requirements. A copy of that memo is attached. The unresolved issue at that time was the reporting of treatment data. The Executive Steering Committee requested the DSC to revisit the cost data and to make its final recommendations based on the new data. Since that time new cost data were obtained from states. Results were similar to the original figures. The DSC formulated its final recommendations based on that new cost data and comments from its committee, the states and ASDWA. This technical guidance document, therefore, contains some new reporting requirements for treatment data.

The final report attached today provides the detailed technical guidance to implement the additional reporting requirements discussed in the April 1997 notice. The reporting requirements included in this guidance are the following:

- Owner Type code (added to Core Data Set)
- Service Area Characteristics (added to Core Data Set)
- Geographic Area Data (added to Core Data Set)
- Address Data (revised)
- Treatment Data (added to Core Data Set)
- Locational Data (added to Core Data Set)
- Other inventory information and Data Sharing Goals

The Appendices include the following:

- A technical guidance to implement treatment data requirements (Appendix A)
- A technical guidance to implement locational data requirements, and the list of required and recommended data elements, definitions and coding standards (Appendices B, C, and D)
- A grand summary of current reporting requirements (Appendix E)
- An earlier memo on the definitions related to the types of water systems (Appendix F)
- List of SDWIS/FED contacts (Appendix G)

A fact sheet that summarizes the changes to the SDWIS inventory reporting requirements and the schedule for reporting are also included with this document. Most data are due to be submitted no later than January 1, 2000. I believe that we have struck a balance between setting realistic, but not overly burdensome requirements. Several of these reporting requirements will improve the reporting of program functions and provide needed information to support regulatory development and promote consistency across agency programs. In particular, reporting of additional treatment data and the collection of locational coordinates will greatly improve the understanding of source water protection and the use of spatial data within SDWIS/FED.

Thank you to the members of the DSC, including those state, regional, and headquarters members who gave so much of their valuable time to the discussions and participated in the workgroup meetings.

I would appreciate any feedback on the utility of this format for conveying this technical guidance to your staff. If you have any questions on these new reporting requirements, please contact me at (202) 260-5525 or Jan Auerbach at (202) 260-5274. Your staff may wish to contact Tom Poleck (Region 5) at (312) 886-2407 or Roger Anzzolin (HQ) at (202) 260-7282.

Attachments

Addressees: State Drinking Water Administrators
 Regional Drinking Water Program Managers/Coordinators
 Regional Drinking Water Enforcement Managers/Coordinators

cc: Data Sharing Committee
 ASDWA/EPA Data Management Steering Committee
 Cynthia Dougherty, OGWDW
 Elizabeth Fellows, OGWDW
 Jan Auerbach, OGWDW
 Vanessa Leiby, ASDWA

April 11, 1997

MEMORANDUM

SUBJECT: *Early Notice on Revised Safe Drinking Water Information System (SDWIS)
Inventory Reporting Requirements*

FROM: Cynthia Dougherty, Director
Office of Ground Water and Drinking Water

TO: Addressees

This memorandum provides an early notice regarding the changes to the SDWIS/FED inventory reporting requirements. These changes resulted from the data sharing process that we began over two years ago to analyze EPA data needs and existing reporting requirements. The *Protocol for Making Data Sharing Decisions* (December, 1995) was followed; that protocol provided for State and Regional input with adequate review periods. These recommendations were also reviewed and concurred on in substance by the SDWIS Executive Steering Committee and the ASDWA/EPA Data Management Steering Committee, both of which have EPA Regional and State representatives.

The purpose of transmitting this information to you now is to provide an early notice of tentative new reporting requirements. The final notice is planned to be sent later this summer, once the complete technical guidance is developed and final decisions on reporting requirements are made. A fact sheet that summarizes the tentative changes to the SDWIS inventory reporting requirements is attached. Please feel free to use this information for planning purposes, but recognize that the technical details and even the decisions on some specific requirements have not been finalized.

The category of information which is still in question is treatment data. Our contractor is currently preparing the complete technical guidance to implement the current recommendations. Once this occurs, we will be able to more accurately judge the impacts of the recommended new reporting and decide, with your input, whether the impacts are warranted. One possible advantage to reporting more complete treatment data such as corrosion control treatment would be to eliminate the need for reporting the milestone under the Lead and Copper Rule that this treatment has been installed.

I recognize that, overall, these changes result in an increase in the amount of inventory data that must be reported to SDWIS/FED. Much effort went into balancing the need for data at the Federal level with setting realistic reporting requirements that are achievable and not overly burdensome on States.

These new reporting requirements will better support our program functions by providing information to support regulatory development, facilitate oversight, and promote consistency across environmental media. In addition, our on-going review of existing reporting requirements

for the major drinking water rules will likely result in reduced reporting requirements, especially for rules like the Lead and Copper Rule. Where there are some definite cost and resource impacts, such as for latitude/longitude data, phased-in implementation schedules have been set that reduce annual cost and minimize the reporting burden. We request suggestions for how we might be able to assist States with the collection and reporting of any of these data.

Thank you to everyone who participated in this effort, especially those States and Regions that served directly on the Data Sharing Committee. Your efforts have helped us make what I hope you agree are reasonable decisions on reporting requirements.

If you have any questions on these revised requirements, please contact me at 202-260-5543, or Jan Auerbach at 202-260-5274. You may also wish to contact Tom Poleck, Chair of the Data Sharing Committee, at 312-886-2407.

Addressees: State Drinking Water Administrators
Regional Drinking Water Program Managers/Coordinators
Regional Drinking Water Enforcement Managers/Coordinators

cc: Data Sharing Committee
Data Sharing Committee Advisory Group
ASDWA/EPA Data Management Steering Committee
Robert Blanco, OGWDW
Jan Auerbach, OGWDW
Vanessa Leiby, ASDWA

Safe Drinking Water Information System (SDWIS)

FACT SHEET

Revised Inventory Reporting Requirements

June 1998

The reporting requirements as described in this fact sheet are the result of an extensive review of the SDWIS inventory data needs and the current reporting requirements conducted by the SDWIS Data Sharing Committee (DSC) and others. The changes to the current inventory reporting requirements are presented below in general terms. The technical details and implementation guidance are found in the technical guidance document, *Revised Inventory Reporting Requirements for the Safe Drinking Water Information System (SDWIS/FED) Technical Guidance, June 26, 1998*. A summary of the reporting requirements is also found in Appendix E of this revised guidance.

The needed data, represented in SDWIS/FED as data attributes, are divided into two main groups: Core Data Set attributes, and Data Sharing Goal attributes. Core Data Set attributes represent the new reporting requirements and will be associated with state annual grant allotments. These attributes were judged as the most essential to describe the drinking water program at the national level and to support U.S. EPA's most basic program responsibilities. Only Core Data Set attributes are discussed in this fact sheet. Data Sharing Goal attributes are also needed by EPA to support important program functions and, where possible, should be negotiated by each Region and State and reported to SDWIS/FED.

The following data will no longer be in the Core Data Set or counted toward grant eligibility for FY 2001 and beyond. The grant figures for FY 1999 and FY 2000 will still use these attributes so they must continue to be reported until March 1999.

■ Season begin and end dates for noncommunity water systems

The reasons for discontinuing this requirement include: the lack of use for these data except for performing grant calculations, and the perceived inaccuracy of the data due to reported dates that meet the reporting requirement, but do not accurately reflect actual season begin and end dates. The inventory reporting guidance is modified to reinforce the requirement to only report inventory to SDWIS/FED that meets the Federal definition. Double-checking by EPA to see that noncommunity water systems were opened for the required number of days is redundant and not a convincingly justified use of the data.

The following requirement for address data is revised:

ADDRESS DATA The official address of a public water system represents the name and mailing address of the responsible person (e.g., an owner or operator) associated with the public water system.

- ▶ Address information is required for all water system types and should become part of a state's routine updating or replacement of inventory data. The official address consists of

- the name of the water system, two address lines which are used to identify the responsible person and the mailing street address, a city, state and zip code.
- ▶ If the latitude and longitude of any treatment plants are not reported, then an additional physical address must also be reported for each plant.

The following new inventory data are being added to the Core Data Set:

GEOGRAPHIC AREA DATA Geographic area data include the city(s) and county(s) served by the water system.

- ▶ City and county served data are required for all water system types and should become part of a state's routine updating or replacement of inventory data. County served or a county equivalent, must be reported for all water systems. City served is only reported in those cases where the water system serves a city or equivalent jurisdiction. Where multiple cities or counties are served, all should be reported.
- ▶ The city served is an alphanumeric value that represents a city, community or jurisdiction that is being served by a public water system in whole or in part. The county served is a code value that represents a county, or county equivalent, that is being served by a public water system in whole or in part.

OWNER TYPE CODE A code that indicates the owner type (e.g., Federal, private, Native American, etc.) for each water system is to be reported. This used to be a grant-eligibility data element but was removed from the list a few years ago. Owner type code is required for all water system types and should become part of a state's routine updating or replacement of inventory data.

SERVICE AREA CHARACTERISTICS A code that represents the primary type of area (e.g., schools, day care centers, mobile home parks, etc.) being served by a water system in whole or in part is to be reported. This used to be a grant-eligibility data element but was removed from the list a few years ago. Service Area Characteristic codes are required for all water system types and should become part of a state's routine updating or replacement of inventory data.

LATITUDE & LONGITUDE DATA The latitude/longitude coordinates and the six required method, accuracy and description (MAD) codes under the EPA Locational Data Policy (LDP) are to be reported for all active sources of water (surface water intakes and wellheads). The guidance lists as a Data Sharing Goal the reporting of locational data of the water treatment plant(s). The LDP also recommends eight (8) optional

elements to be collected.

TREATMENT DATA As part of the SDWIS/FED inventory Core Data Set, the following treatment data are required to be reported:

- a. All treatment data (treatment objectives and processes) for all sources of water;
- b. All water sources that are untreated;
- c. Any new and innovative treatment combination or process;
- d. Treatment status by the seller of purchased water; and the
- e. Linkage between sources of water and treatment plants.

Treatment information is required for all water system types and should become part of a state's routine updating or replacement of inventory data.

Implementation Schedule

Except for latitude/longitude data and treatment data, all new requirements will become effective on January 1, 2000. For latitude/longitude data and treatment data, all data for community water systems are due by January 1, 2000. For latitude/longitude and treatment data for non-transient, non-community water systems, 20% of the data are due by January 1, 2001 and 20% more per year until January 1, 2005. For treatment data, all transient noncommunity water systems are due by January 1, 2005. Reporting of lat/long data for transient noncommunity water systems is not in the Core Data Set, but is a Data Sharing Goal. Where possible, reporting for transient systems is encouraged.

SDWIS/FED is being modified to accept all of the new requirements. As these new capabilities go into production, the states and regions will be notified as to the earliest date that certain data can be reported to SDWIS/FED. As of today, the following data can be reported to SDWIS/FED:

- owner type codes
- service area characteristics
- geographic areas
- address data
- some of the required water system facility data (i.e. all required basic facility inventory elements, treatment objective and process codes, latitude and longitude coordinates reported as degrees, minutes and seconds).

The reporting of latitude/longitude data should be possible by the end of this year or in early 1999. The reporting of treatment linkages and the other new treatment codes will be available soon after the locational data processing is available.

Until these new requirements become effective, the current reporting requirements must, at a minimum, continue to be reported.

Revised Inventory Reporting Requirements for the Safe Drinking Water Information System (SDWIS/FED)—Technical 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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