

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WSG 13

Date Signed: August 1978

MEMORANDUM

SUBJECT: Grant Allocation

FROM: Alan Levin, Director (signed by Alan Levin)  
State Programs Division, ODW (WH-550)

TO: Regional Water Supply Representatives, I-X

It has been brought to my attention that there is some question in regard to the definition of a public water system for use in the grant allocation formula. Specifically, the question is, "If a primacy State has authority to cover community water systems below 15 service connection or 25 individuals, can the State include those systems in their inventory for the purpose of receiving additional grant funds?"

While it can be argued that the State is providing additional resources to cover smaller systems and consequently ensuring the delivery of safe water to a larger population, we feel that we must be consistent in the allocation of the grant funds. Accordingly, only those systems serving 15 service connections or 25 individuals will be used in the grant allocation irrespective of the State definition.

This decision is based upon two primary factors:

- (1) The funds allotted under the Safe Drinking Water Act should be utilized to implement the mandates (and limitations) of the Act.
- (2) Most States assumed that the grant funds would be distributed on the 15/25 basis and any change in that implied policy would be disruptive with respect to State coverage, laws, and regulation if they attempted to maintain their percentage share of the national authorization.

In summary, we will continue to only count those community systems serving 15 service connections or 25 individuals or larger for the purpose of determining the grant allocation.