UNITED STATES ENVIRONMENTAL PROTECTION AGENCY GUIDANCE FROM HOTLINE COMPENDIUM

WSG H2

SUBJECT: Interstate Carriers

SOURCE: Ray Enyeart

What is the difference between an interstate carrier and a non-community water system? Can an interstate carrier be classified as a non-community water system? If so, can such an interstate carrier be classified as a non-transient non-community water system (NTNCWS)?

Response:

Those interstate carriers that meet the definition of a public water system, as specified in 40 CFR Section 141.2(e), are considered to comprise a subcategory of non-community water systems. An interstate carrier could therefore be a NTNCWS if it meets the NTNCWS definition; i.e., if it is large enough to employ 25 or more people for six or more months per year.

Note: This guidance may be updated in the future. Contact Steve Clark at EPA Headquarters for further information.