



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OSWER Directive 9283.1-09

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: The Role of CSGWPPs in EPA Remediation Programs

FROM: Timothy Fields, Jr.
Acting Assistant Administrator

A handwritten signature in black ink that reads "Timothy Fields, Jr." in a cursive style.

TO: Regional Administrators
Regions I-X

PURPOSE

This Directive recommends that EPA remediation programs be familiar with Comprehensive State Ground Water Protection Programs (CSGWPPs) and utilize them as a means of giving more flexibility to a State for management of ground-water resources. EPA's ground-water remediation programs - **Superfund, RCRA Subtitle C and D, and Underground Storage Tanks** - have an important stake in the CSGWPP process. More specifically, this Directive establishes the policy that EPA remediation programs generally should:

- Defer to State determinations of current and future ground-water uses, when based on an EPA-endorsed CSGWPP that has provisions for site-specific decisions;
- Participate in EPA's review and endorsement of CSGWPPs; and
- Use other CSGWPP provisions, as appropriate, for more effective or efficient program implementation (e.g., increased program emphasis in geographic areas identified in a CSGWPP as having higher resource value or priority).



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For the Superfund program the policy, stated above, is intended to revise and supersede guidance provided in the Preamble to National Contingency Plan (NCP),¹ as discussed under *Implementation* (Section A) of this Directive.

Background information on CSGWPPs is provided below. More detailed discussion of when EPA should defer to State determinations of future ground-water use is provided under *Implementation*, Section A. Discussion of EPA involvement in the CSGWPP review and endorsement process is provided in Section B, and the role of other CSGWPP provisions in EPA remediation programs is discussed in Section C.

BACKGROUND

One of the primary purposes of a CSGWPP is to provide a framework for EPA to give greater flexibility to a State for management and protection of its ground-water resources. Such a program was first envisioned in EPA's Ground-Water Strategy for the 1990s,² which states that:

"To the extent authorized by EPA statute and consistent with Agency program implementation objectives, EPA will defer to State policies, priorities, and standards once a State has developed an 'adequate' program."

EPA's CSGWPP Guidance

Guidance describing what the Agency meant by an "adequate" ground-water program was issued in 1992. This document, entitled *Final Comprehensive State Ground Water Protection Program*,³ identified six Strategic Activities that should be included in a Comprehensive State Ground Water Protection Program to be considered "adequate" by EPA. (Readers of this Directive are strongly advised to read the 1992 Final CSGWPP guidance to gain a more complete understanding of the CSGWPP approach.) The Strategic Activities identified in the 1992 Final CSGWPP Guidance are listed in Attachment 1.

The 1992 Final CSGWPP Guidance describes how developing a CSGWPP is a three-stage process. First, a State develops a Core CSGWPP and submits it to the EPA Regional office for review and endorsement. (The review and endorsement process is discussed under *Implementation*, Section B.) The Core Program **need include only one ground-water protection or remediation program** to demonstrate whether the State's CSGWPP approach is

¹The "National Oil and Hazardous Substances Pollution Contingency Plan, Final Rule" (NCP) provides the regulatory framework for the Superfund program. The NCP was published in 1990 in Volume 55, No. 46, March 8, 1990 of the Federal Register; and is included in the Code of Federal Regulations (CFR) as 40 CFR Part 300.

²"Protecting the Nations Ground Water: EPA's Strategy for the 1990s," Publication 21Z-1020, Office of the Administrator, July 1991.

³EPA publication: EPA 100-R-93-001, Office of the Administrator, December 1992.

consistent with the guidance. Several States have already developed or are developing a Core CSGWPP, as indicated in Attachment 2. Second, after the Core Program is endorsed by EPA, joint State-EPA discussions should result in a "multi-year planning agreement" for incorporating additional State and EPA programs into the CSGWPP, leading to a "Fully Integrating CSGWPP." **The Core CSGWPP provides the basis for multi-year planning discussions.** Third, at the completion of the multi-year planning and implementation processes, a "Fully Integrating" CSGWPP occurs when the six previously mentioned Strategic Activities fundamentally influence and are supported by the day-to-day operations of **all federal, state and local ground-water related protection and remediation programs.** Adequacy criteria, which describe what EPA expects from a State for both a Core and Fully Integrating CSGWPP, are described in the 1992 Final CSGWPP guidance.

EPA Commitments Supporting CSGWPPs

In the 1992 Guidance, EPA recognized that fundamental changes within its own programs were just as much a prerequisite to achieving a Fully Integrating CSGWPP as the Strategic Activities that a State needs to undertake. EPA documented its willingness to change its own programs in a document entitled, *EPA's Commitments to Support Comprehensive State Ground-Water Protection Programs*.⁴ This document identified specific actions, that EPA has already taken, will take, or will evaluate for future action to support CSGWPPs. The primary focus of the commitments is to provide the States enhanced flexibility for setting their own priorities and promoting greater State- and community-based decision making. The 1995 commitments reflect only the first set of EPA actions to support States developing CSGWPPs. EPA will continue to review proposals for future actions and program changes that could improve comprehensive ground-water protection.

CSGWPPs and Performance Partnership Agreements

A Performance Partnership Agreement (PPA) is a broad strategic document containing a joint statement of priorities and goals negotiated between a State and an EPA Region. It is also called an Environmental Performance Agreement. States that have negotiated or are in the process of negotiating PPAs may have accomplished some of the critical activities needed for a CSGWPP. For States that have an EPA-endorsed CSGWPP, the CSGWPP can become part of a PPA and would constitute the State's priority setting policy for ground-water protection and remediation. For further information concerning PPAs, refer to the EPA fact sheet entitled *State/EPA Performance Partnerships*.⁵

⁴EPA Publication EPA 100-R-95-002, Office of the Administrator, June 1995.

⁵Publication 100-F-96-024, Office of Regional Operations and State/Local Operations, October 1996.

CSGWPPs and EPA Remediation Programs

The overall goal of EPA remediation programs is to protect human health and the environment. With respect to ground water, this goal includes taking actions to prevent ground-water resources from becoming contaminated in the first place, preventing unacceptable exposures of human and ecologic receptors to contaminated ground water, and remediating contaminated aquifers to beneficial uses where practicable. EPA recognizes the limited resources available for ground-water protection and remediation, the need to prioritize these activities, and the central role of the States in making ground-water protection and remediation decisions. EPA anticipates that the CSGWPP process will be the vehicle by which EPA and the States can come to a mutual understanding of regulatory requirements, policies and priorities that influence ground-water protection and remediation decision making.

In developing a Core CSGWPP, EPA generally expects a State to devise guidelines to classify and/or prioritize ground waters based upon their current use, expected future use, vulnerability to contamination, resource value, or similar factors. Such resource-based classifications or priorities can then be used by the State and EPA for a variety of purposes, including:

- **Program planning**, so that protection and remediation efforts can be emphasized in geographic areas with high priority ground waters (see *Implementation*, Section C); and
- **Program decision-making**, in which current and expected future uses (or other factors such as resource value) are an important factor in decisions regarding remediation of contaminated sites.

However, the Agency's experience with Core CSGWPPs developed to date is that they generally cannot be used for the site-specific decisions made by EPA remediation programs, because they either:

- Define broad scale (e.g., basin-wide) classifications or priorities that cannot be applied to ground waters at specific sites; or
- Do not define a basis for distinguishing among ground-water resources within the State (i.e., all ground waters have the same expected use or priority).

Implementation of EPA remediation programs requires that assessments and remediation decisions be made at specific sites or facilities. Thus, if a CSGWPP is expected to provide comprehensive guidance to EPA concerning remediation decisions, it should have provisions which allow ground-water classifications or priorities to be determined at a specific site anywhere in the State. For example, if a Core CSGWPP defines high value ground waters (and/or those of low value) and is expected to be utilized in remediation decisions, the definition should include criteria which allow the resource value of ground water to be determined at a

specific site anywhere in the State. Also, for this example, EPA and the State should have reached agreement on how the resource value of ground water is to be utilized in remediation assessments or decisions. Further discussion of CSGWPP provisions that support site-specific determination of ground-water classification or priority is provided under *Implementation*, Section A, of this Directive.

In general, a Core CSGWPP that provides no mechanism for distinguishing among ground waters of the State provides less useful information for site-specific remediation decisions than a CSGWPP that does draw distinctions among different ground-water resources. Further, such a CSGWPP does not meet the intent of EPA's 1992 CSGWPP guidance which expects a Core CSGWPP to provide some method for establishing priorities among ground-water resources based on ground-water characteristics and/or other factors.⁶ For a CSGWPP that defines all ground waters as a source of drinking water or as high priority, EPA remediation programs should work with other EPA and State programs during the CSGWPP review process (see *Implementation*, Section B) to develop criteria which can be used to further distinguish among the State's ground waters at specific sites (see *Implementation*, Section A).

EPA recognizes that not all States plan to develop a ground-water classification system as part of their Core CSGWPP. As an alternative approach, a CSGWPP may define the relative value, priority or vulnerability of ground-water resources rather than current and expected future uses. For a CSGWPP that does not define current and future ground-water uses, EPA remediation programs should work with other EPA and State programs during the CSGWPP review process to clarify how the relative value, priority or vulnerability will be used to make assessment or remediation decisions at specific sites.

IMPLEMENTATION

A. EPA Deferral to State Determinations of Future Use

Current Practice

Determining current and future uses of contaminated ground waters at a particular site or facility is important for all EPA remediation programs. These programs consider ground-water uses when assessing the risks posed by the contamination, determining appropriate remedial objectives, and in setting appropriate cleanup levels when ground-water restoration is an objective. In the Underground Storage Tank program, site-specific cleanup requirements generally are established based on the current and future risks posed by the site, including risk-based cleanup levels for specific ground-water contaminants. In Superfund and the RCRA

⁶This is called for by Core Adequacy Criterion 2 under Strategic Activity 2 (page 2-7) of the 1992 Final CSGWPP Guidance: "A State's ground water priority-setting process is based primarily on consideration of varying ground water characteristics such as those listed on Figure 2-1 on Page 2-18 [of the 1992 guidance]."

Subtitle C and D programs, drinking water standards⁷ generally are used as cleanup levels for ground waters that are determined to be a current or potential future source of drinking water. Conversely, these programs generally do **not** use drinking water standards as cleanup levels for ground waters that are not a potential source of drinking water; and for this case, cleanup levels generally are determined from a site-specific evaluation of risk and receptors. For example, appropriate cleanup levels for contaminated ground water flowing into surface water could be based on ensuring protection of ecologic receptors, rather than direct ingestion of the ground water by humans. Also, ground-water uses could include support of surface water ecosystems. **Thus, determining current and future ground-water uses is necessary to determine the potential risks posed by the contamination, and as a result, the remediation objectives and/or cleanup levels needed to protect human health and the environment.**

Current practice in determining ground-water uses at a particular site or facility varies somewhat among EPA remediation programs. EPA programs generally consider State ground-water classifications or similar State designations for determining current and future ground-water uses. For the Superfund program, guidance on this issue is provided in the NCP Preamble, which recommends that the Agency's 1984 *Ground-Water Protection Strategy*⁸ and 1986 *Guidelines for Ground-Water Classification*⁹ be used as guidelines for determining future use of ground waters at a particular site. (These documents defined Class I, II and III ground waters.) The Superfund program also considers State ground-water classifications in determining future use, but the NCP Preamble advises that where State and EPA classifications result in different ground-water use scenarios, the classification leading to the more "stringent" remediation goals should be used. Thus, ground waters at a given site are generally assumed to be a future source of drinking water if designated as such by the State or if considered to be a potential source of drinking water under the 1986 Classification Guidelines. For any use scenario, Superfund remedies must be protective of human health and the environment.

Policy Change for Superfund

For the Superfund program the policy of deferring to a State's ground-water use determination (discussed below) **supersedes the guidance** provided in the NCP Preamble (discussed above). This policy change is necessary to make the Superfund program consistent with *EPA's Strategy for the 1990s* and the 1992 Final CSGWPP guidance. Although the NCP Preamble is not part of the rule, it is used as program guidance. At the time it was written the NCP Preamble was consistent with the Agency's 1984 *Ground-Water Protection Strategy* and

⁷Drinking water standards include maximum contaminant levels (MCLs) or non-zero Maximum Contaminant Level Goals (MCLGs) promulgated under the Safe Drinking Water Act, more stringent State drinking water standards, or risk-based levels for contaminants that do not have federal or State MCLs.

⁸"Ground-Water Protection Strategy," Office of Ground-Water Protection, August 1984.

⁹"Guidelines for Ground-Water Classification Under the [1984] EPA Ground-Water Protection Strategy, Final Draft," Office of Ground-Water Protection, November, 1986.

the 1986 Classification Guidelines, which have since been superseded by *EPA's Strategy for the 1990s* and the 1992 Final CSGWPP guidance. The NCP Preamble states:

"If a state classification would lead to a less stringent solution than the EPA classification scheme, then the remediation goals will generally be based on EPA classification."¹⁰

For States that have a CSGWPP that has been endorsed by EPA and has provisions for site-specific decisions, EPA will generally defer to State determinations of current and future ground-water uses, as discussed below. For States that do **not** have an EPA-endorsed CSGWPP, or for CSGWPPs that do **not** have provisions for making site-specific determinations of ground-water use (or resource value, priority or vulnerability), the Superfund program will continue to follow guidance provided in the NCP Preamble, as stated above. No policy change is needed for the RCRA Subtitle C and D and Underground Storage Tank programs because these programs already have the flexibility to defer, where appropriate, to State determinations of ground-water use under a wide range of circumstances.

Deferral to EPA-endorsed CSGWPPs

Under this Directive, Superfund and other EPA remediation programs should generally defer to a State's determination of current and future ground-water uses, when based on criteria or methodology that 1) are specified in an EPA-endorsed Core CSGWPP, and 2) can be applied at specific sites or facilities. **Under such a CSGWPP and except as noted below, EPA remediation programs generally should defer to a State's determination of ground-water use even when it differs from the use that would otherwise have been determined by EPA using the 1986 Classification Guidelines. As a result, EPA remediation programs should generally assess site risks (e.g., the Baseline Risk Assessment for Superfund sites) and establish remediation objectives and/or cleanup levels consistent with the CSGWPP-determined ground-water uses.**

Ground-water use determinations in previous remediation decisions, including Superfund Records of Decision and permits or orders issued under RCRA Subtitle C or D authority, are unaffected by this Directive or by EPA endorsement of a State's CSGWPP. EPA would follow applicable requirements of the relevant remediation program in determining whether to change any existing decision document, based on new information concerning the site or facility.

Exceptions to the above policy of EPA generally deferring to State ground-water use determinations may be appropriate under certain circumstances. These exceptions are expected to be rare for CSGWPPs that have been reviewed and endorsed by EPA remediation programs.

¹⁰NCP Preamble at page 8733.

In general, it may be appropriate to depart from a State's determination of current and future ground-water use if the State's determination:

- Is not consistent with the EPA-endorsed CSGWPP;
- Is not consistent with an existing, applicable State or federal statute or promulgated regulation;¹¹
- Is based on technically incorrect or erroneous information;
- Affects an interstate aquifer and is not consistent with the use determination for this aquifer in an adjacent State; or
- Would lead to selection of a remedy that EPA considers **not** sufficiently protective of human health and the environment.

States have been authorized to implement some EPA remediation programs, such as the RCRA Subtitle C and D and Underground Storage Tank programs. For States with an EPA-endorsed CSGWPP, EPA expects that State determinations of ground-water use at specific facilities to be assessed or remediated under these authorized or approved programs will generally be consistent with the CSGWPP.

Provisions Supporting Site-specific Decisions

If a CSGWPP is expected to provide comprehensive guidance to EPA concerning remediation decisions, the CSGWPP should have provisions which allow ground-water classifications or priorities to be determined at a specific site or facility anywhere in the State, as discussed above. In this Directive, CSGWPP provisions supporting site-specific decisions are defined as factors, criteria or a methodology included in the CSGWPP for determining ground-water classifications or priorities at a specific site. Including these provisions in a CSGWPP will ensure that these factors, criteria or methodology are consistently applied throughout the State. Examples of physical characteristics and other factors that can be used to define the use, or relative value or priority of ground-water resources at specific sites are provided in Figure 2-1 (page 2-18) of the 1992 CSGWPP Guidance. Also, EPA Region I has completed a regional guidance¹² which identifies factors for determining ground-water "use and value" at a specific site and explains how these determinations will generally be used by EPA remediation programs

¹¹For example the Safe Drinking Water Act and 40 CFR, Sections 144.3, and 146.3, define an "underground source of drinking water."

¹²"Final Groundwater Use and Value Determination Guidance, A Resource-Based Approach to Decision Making," U.S. EPA Region I, April 4, 1996. (For copies of this Region I guidance, contact Gloria Hume at (617) 573-5700.)

in that Region. The Region I guidance provides a good example of an approach to site-specific determination of ground-water resource priorities that can be included in a Core CSGWPP or developed as a separate EPA-State agreement subsequent to EPA endorsement of a Core CSGWPP.

As discussed above, some Core CSGWPPs do not provide a basis for distinguishing among ground-water resources within the State (i.e., all ground waters have the same expected future use or priority). Although some States have statutes or regulations designating all ground waters as potential drinking waters, the CSGWPP should include some method for setting ground-water resource priorities within the State. Examples of factors or criteria which can be used to distinguish among **potential drinking waters** on a site-specific basis are:

- Expected time frame of future use;
- Likelihood of use within a certain time period (e.g., 30 years);
- Relative priority or value; or
- Relative vulnerability of ground waters.

The types of site-specific provisions listed above are useful to EPA remediation programs because, in addition to assessing risks and establishing cleanup levels based on expected ground-water uses, these programs must evaluate alternative remedial measures and select those most appropriate for a given site or facility. Different remedial measures often require substantially different time periods to attain the remedial objectives. For example, remedial measures that require a relatively long period of time to attain drinking water standards may be appropriate for contaminated ground waters that are not expected to be used for this purpose in the near future. A longer remediation time frame may also be appropriate for ground waters of lower priority or resource value.

To support remediation under the Underground Storage Tank program, the CSGWPP should also have a mechanism for providing site-specific flexibility in setting risk-based remediation requirements, including cleanup levels for specific ground-water contaminants, based on the current and future risks posed by the site.

Provisions that support site-specific remediation activities should be part of a **Core CSGWPP prior to EPA-endorsement** when it includes an EPA remediation program (i.e., the six Strategic Activities have been demonstrated using this program). When an EPA remediation program is **not** part of the Core CSGWPP, additional provisions for site-specific decision-making should be established in State-EPA negotiations during the subsequent "multi-year planning" stage. When provisions specific to one or more EPA remediation programs are added subsequent to EPA endorsement of the Core CSGWPP, these provisions can either be included

as a separate agreement (e.g. a Memorandum of Agreement) or as an update or attachment to the Core CSGWPP.

B. EPA Involvement in CSGWPP Review and Endorsement

Review Process

After developing their Core CSGWPPs, States submit them to EPA regional offices for cross-program review. **Regional staff from all EPA remediation programs, including RCRA Subtitle C and D, Superfund and Underground Storage Tanks, or cross-program representatives should be involved in the review of a Core CSGWPP.** In this review, EPA Regional staff should assess the implications for and useability of the principles developed in the Core CSGWPP by their respective programs. Regional staff should also make sure that program-specific issues will be resolved, either:

- In the Core CSGWPP, or
- During the "multi-year planning" stage, after the Core CSGWPP has been endorsed.

In the current review process, multiple program offices are part of the review team from both the respective Region and Headquarters, although Headquarters program offices review only the first Core CSGWPP submitted to each Region. Regional ground-water protection programs generally have the lead for the EPA review process.

Focus of Review

When reviewing a Core CSGWPP, EPA remediation program staff should pay particular attention to the following sections of a Core CSGWPP:

- The State's **method for establishing ground-water priorities**, based on "varying ground-water characteristics;"¹³ and
- Discussion of how ground-water characteristics are to be used to "**support rational decision-making" for site-specific remediation activities.**¹⁴

These two Adequacy Criteria are closely linked. A Core CSGWPP should **define and demonstrate use** of a priority setting mechanism in at least one ground-water program. It should also discuss how this priority setting mechanism would be applied to other programs not profiled in the Core CSGWPP, including facility siting and remediation programs. EPA remediation

¹³Adequacy Criterion 2 under Strategic Activity 2, defined in EPA's 1992 CSGWPP Guidance, page 2-7.

¹⁴Adequacy Criterion 6 under Strategic Activity 4, defined in EPA's 1992 CSGWPP Guidance, page 2-12.

program staff should determine whether the sections of the Core CSGWPP, noted above, adequately support types of site-specific assessments and decisions made by their specific remediation programs. If not, EPA remediation programs should request that provisions supporting site-specific decisions be added either to the Core CSGWPP prior to EPA endorsement or added in subsequent CSGWPP agreements, as appropriate. (See above discussion under "Provisions Supporting Site-specific Decisions.")

C. Role of Other CSGWPP Provisions in EPA Remediation Programs

In addition to current and expected future ground-water uses, a CSGWPP may provide additional information that can be used by EPA programs for program planning, so that protection and remediation efforts can be emphasized in areas where ground waters have a high resource value or priority. EPA remediation programs should utilize the resource value or priority defined in an EPA-endorsed CSGWPP, as appropriate, for more effective or efficient implementation of program activities. For example, an EPA remediation program could set priorities for sites requiring initial assessments based in part on the resource value or priority defined in an EPA-endorsed CSGWPP. A more specific example would be where an EPA remediation program schedules initial site assessments in well head protection areas (i.e., high priority) prior to assessments in other areas.

For further information concerning the role of CSGWPPs in EPA remediation programs, contact Ken Lovelace of EPA's Office of Emergency and Remedial Response at (703) 603-8787, Guy Tomassoni of the Office of Solid Waste at (703) 308-8622, or John Heffelfinger of the Office of Underground Storage Tanks at (703) 603-7157. For more information about CSGWPPs in general, contact the ground-water program representative in your Region.

Attachments

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NOTICE: This document provides guidance to EPA staff. It also provides guidance to the public and to the regulated community on how EPA intends to exercise its discretion in implementing its regulations. The guidance is designed to implement national policy on these issues. The document does not, however, substitute for EPA's statutes or regulations, nor is it a regulation itself. Thus, it cannot impose legally-binding requirements on EPA, States, or the regulated community, and may not apply to a particular situation based upon the circumstances. EPA may change this guidance in the future, as appropriate.

Attachment 1**STRATEGIC ACTIVITIES OF A
COMPREHENSIVE STATE GROUND WATER PROTECTION PROGRAM***

1. “Establishing a ground water protection goal to guide all relevant federal, State, and local programs operating within the State;
2. Establishing priorities, based on characterization of the resource, identification of sources of contamination, and programmatic needs, to guide all relevant federal, State, and local programs and activities in the State toward the most efficient and effective means of achieving the State’s common ground water protection goal;
3. Defining authorities, roles, responsibilities, resources, and coordinating mechanisms across relevant federal, State, tribal, and local programs for addressing identified ground water protection priorities;
4. Implementing all necessary efforts to accomplish the State’s ground water protection goal consistent with the State’s priorities and schedules;
5. Coordinating information collection and management to measure progress, re-evaluate priorities, and support all ground water-related programs; and
6. Improving public education and participation in all aspects of ground water protection to achieve support of the State’s protection goal, priorities, and programs.”

* From 1992 Final CSGWPP Guidance, pages 1-19 and 1-20.

Attachment 2***STATUS OF COMPREHENSIVE STATE GROUND WATER PROTECTION PROGRAMS**

EPA Region	States with Core CSGWPP Endorsed by EPA	States with Core CSGWPP Submitted to EPA
Region 1	Connecticut, Massachusetts, New Hampshire	
Region 2		New Jersey, New York
Region 3		
Region 4	Alabama	Georgia, Florida
Region 5	Wisconsin	Illinois
Region 6	Oklahoma	Arkansas, Louisiana
Region 7		
Region 8		Montana
Region 9		Nevada
Region 10		Washington
Total No. States	6 States	10 States

TOTAL OF 16 STATES HAVE SUBMITTED CSGWPPS TO EPA

Based on information provided by EPA's Office of Ground Water and Drinking Water, Ground Water Protection Division, as of March, 1997.