WEST VIRGINIA DEPARTMENT OF HEALTH AND HUMAN RESOURCES
PUBLIC WATER SYSTEM SUPERVISION PROGRAM

FY 2002 END-OF-YEAR PROGRESS REPORT

This checklist consists of the activities in the EPA Region III PWSS Program Guidance and the WVDHHR workplan for FY'2002. It is meant to assist in the tracking of tasks completed and aide in evaluating the state's progress in accomplishing these activities.

FUNDING:

	FEDERAL	STATE	TOTAL
FY'02	891,180	$587,918	$1,479,098

TASK NO.	ACTIVITY	REFERENCE	DUE DATE / REPORTING	COMMENTS
1.	**FOCUS ACTIVITIES FOR FY '02**			
1.0	**Consumer Confidence Report (CCR) Rule**			
1.0.1	Consumer Confidence Report Extension Agreements: Continue to implement the CCR activities as agreed upon in the EPA/State Extension Agreements.	§142.12	semi-annual self assessment.	Ongoing. CCR primacy package submitted to EPA. Interim primacy granted 9-02.
1.0.2	Development and adoption of CCR regulations, including the submission of final Primacy Revision Package	§142.12 §142.16(f)	By Date in Extension Agreement but	**EPA** denotes commentary added by EPA Region III: Primacy package approved. Federal Register Notice published

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			no later than 8/21/02	04/17/03.
1.0.3	Obtain Governor's waiver - submit to EPA	§141 subpart O	30 days after signature	Copy previously provided to EPA.
1.0.4	Report on implementation of CCR Rule States with Primacy for the CCR rule must report violations and enforcement actions directly to SDWIS States without Primacy: Report CWSs that sent out CCRs and those that did not in an easy to read format, Report similar data for the certifications	40 CFR §31.40 §142.15 §142.16(f)	Quarterly, 11/15/01 and 11/15/02	Reports provided to EPA as required.
		Extension Agreement	data due 8/1/2001 and 8/1/2002	Annual report submitted to EPA as required.
1.1	**New Rule Implementation** ***(see Appendix E for table of effective dates, state adoption date and end date for any Extension Agreements)*** Development and adoption of new rules is included in Section 2.2			
1.1.0	**Unregulated Contaminant Monitoring Rule (UCMR) -** Carry out responsibilities under the mutually agreed upon Partnership Agreement (PA). Specifically those activities occurring in FY2001 are: - Provide notification to systems in State Monitoring Plan and large water systems at least 90 days before sampling must occur; - Provide sampling and reporting assistance to those water	Partnership Agreement	on-going, Report in semi-annual self assessment Treatment plant lat/long must be reported to	Community water systems lat/long data project is 100% complete. Non-community lat/long data is available for approximately 90% of the systems in the GIS database, but has not been transferred to SDWIS/STATE yet. It is anticipated that 100% will be avaialble by end of calendar year 2003.

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	systems performing monitoring of List 1 [and List 2] contaminants; - Ensure that each system's treatment plant location(s) as latitude and longitude is reported to SDWIS; (this is in addition to the street address) - Assist EPA in obtaining water system compliance through follow-up contact with those systems non-complying. EPA will provide a list of such systems.		SDWIS prior to UCMR data being reported to NCOD.	On-going assistance provided to affected water systems and EPA.
	The specific activities for FY2002 are: - Work with community water systems to include 2001 UCMR data in their CCR as applicable; - Provide sampling and reporting assistance to those water systems performing monitoring of List 1 and List 2 contaminants; - Reporting of data into EPA National Contaminant Occurrence Database (NCOD); - Assist EPA in obtaining water system compliance through follow-up contact with those systems non-complying. EPA will provide a list of such systems.		Treatment plant lat/long must be reported to SDWIS prior to UCMR data being reported to NCOD.	On-going assistance provided to affected water systems and EPA.
1.1.1	Interim Enhanced Surface Water Treatment Rule (IESWTR) and Stage 1 Disinfection By-Products (DBP) Continue to carry out early implementation aspects of the rule and other activities as outlined in the Letter Agreements. Specifically, this includes assisting the water suppliers with: Conducting the disinfection profiling monitoring for systems that request assistance. Collecting DBP applicability data from PWSs, if applicable (ICR systems and any other systems the state decides to require to submit the data). Reviewing and approving methods for calculating logs of inactivation of viruses for the disinfection profiling for systems using chloramines or ozone for primary disinfection. Responding to requests for approval of three years of existing operation data for disinfection profiling purposes.	Letter Agreements and Extension Agreements	Semi-annual self assessments	OEHS District Offices provided instructions, when requested, on conducting profiling to water systems. Non applicable. None submitted. West Virginia-American Water Co.'s Kanawha Valley District data 1998-2001. Completed 1-1999 and 1-2001.

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	[Beginning in January 2002, implement IESWTR and Stage 1 DBP; prior to this, notify large, subpart H systems of the requirements]	Subpart P	Notification by October 2001	Completed January 1999 and January 2001
1.1.1.0	To meet the TOC removal requirements, water systems may decide to perform early monitoring, beginning 12 months prior to the compliance date for the system. States will offer compliance assistance to water systems.			January 2001 recommended early sampling. Requests for assistance handled by OEHS District Offices.
1.1.1.1	Assist with data analysis of TTHM levels to make correlations to the increased health protection association with lower MCL Provide annual average (or running annual average or both) TTHM data to Drinking Water Branch		February 28, 2001 for calendar year 2000 data; by February 28, 2002 for calendar year 2001 data; and by February 28, 2003 for calendar year 2002 data.	On-going. **EPA** denotes commentary added by EPA Region III: Data provided as requested.
1.1.2	Work with EPA to develop a mutually agreed upon Implementation Agreement for **LT1**		late 2001 or early 2002	Implementation agreement signed May 1, 2002.
1.1.3	**Lead and Copper Rule (LCR) Minor Revisions** Carry out responsibilities under the mutually agreed upon Agreements	letter agreements or Extension Agreements	Semi-annual self assessments	On-going. **EPA** denotes commentary added by EPA Region III: State must enforce sampling of every 3 years.
1.2	**Training**			
1.2.1	Leverage both PWSS and DWSRF grant set-aside funding to increase the amount of training made available to operators of public water systems. Training on regulations, treatment technologies (particularly small system treatment technologies) and public education should be stressed. Report on the type and numbers of training courses given.		Semi-annual self assessments	Grant to the WV Rural Water Association (WVRWA) to provide oversight on training courses. 2% Technical Assistance was utilized through WVRWA from July 2001-January 31, 2002 and was extended utilizing non-SRF monies through 10-02. WVRWA has provided training classes for operator continuing education hours. 69 training days have been provided.
1.2.2	Train State and local PWSS program staff on new and current regulations and water treatment technologies with a focus on small system treatment technology. EPA Region		Semi-annual self assessments	On-going.

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	III will assist wherever possible.			
1.3	**Data Management**			
1. 3. 1	Follow-up to EPA **Data Verification Audit findings** - State specific issues will be addressed in Section 1.4, below. State will address major findings of report - identified as rule or contaminant areas with ≥ 15% discrepancy rates when comparing the PWS file to data in SDWIS.		Semi-annual self assessments	Data Verification Audit was conducted June 24, 2002. **EPA** denotes commentary added by EPA Region III: Final DV Report sent to state 10/21/02. SEE FOLLOW-UP ISSUES ON NEXT PAGE - 1.3.1(a)

1.3.1(a)

- Train staff to interpret and review monthly operating reports (MORs) for the SWTR.

- Check to ensure all required chlorine residual and turbidity samples are collected properly at required frequency, and are being reported on time.

- Monitor high chlorine residuals more closer in light of the upcoming rules: IESWTR and DBPR.

- Develop tracking system for all PN violations especially, M/R, TCR and Phase II/V. Ensure all PNs are posted and received from the systems.

- Central Office should institute tracking system for radiological contaminants.

- Submit all ALEs for LCR to SDWIS/Fed.

- Work w/ EPA to correct 1995 data in SDWIS/Fed (total replace file vs DTF writer) Mostly Phase II/V violation data errors.

- Address all missing/incorrect data in SDWIS/Fed e.g., lat/long and source treatment flag status.

- Work with Philippi office to develop a more user friendly SDWIS/State change form

- Make concerted efforts to lend technical support for SDWIS/State to Phillippi Office.

- Standardize form laboratories use to display results.

- Make sure all name, address, admin. contact and PWSID info. is reported.

- Report all "28" violations to SDWIS/Fed for failure to conduct sanitary survey or conducting them late.

- Make sure PWSIDs for water sources are consistent through inactivation and reactivations. Correct all data to reflect original PWSID assigned.

- Work with PWSs to correctly identify routine and repeat samples for TCR.

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- Focus more on VOC and SOC results to detect results greater than the MDL. **- Conduct follow-up quarterly monitoring to determine if systems are reliably and consistently below the MCL.**				
1.3.2	**Lead and Copper Rule Minor Revisions (LCRMR) -** Preparing for the changes to the LCR reporting requirements due to the minor revisions to the rule and data reporting requirements are a priority. States may continue to report under the old requirements until January 11, 2002. After this date, SDWIS-FED will no longer accept data which does not meet the LCRMR reporting requirements. States not using SDWIS-State must begin development of or make changes to existing data reporting capabilities. [States using SDWIS-State will begin reporting as the modules become available.]		January 11, 2002 for proper reporting to SDWIS-Fed. February 15, 2001 is the date that LCRMR DEEM milestone data is requested to be reported to SDWIS-Fed.	Began reporting new method May 15, 2001.
1.3.3	**LCR unaddressed violations -** Update data on PWSs that received a violation for monitoring or missed milestones and do not have a follow-up action reported for compliance achieved (i.e., SOX) that is linked to the violation.	§142.16(c)(4)		On-going.
1.3.4	**Surface Water Treatment Rule (SWTR) -** identify PWSs with a SWTR violation that has source types other than surface. Submit new source records and delete old source if appropriate; obtain appropriate treatment data for new source, including filtration code. If violations are incorrect, delete and re-submit correct violation. Implement a QA procedure to prevent these problems from re-occurring. EPA will assist in identifying these water systems.	§142.15(a)(1) & (b)(1)		On-going.
1.3.5	For every **"42" SWTR violation**, enter follow-up action codes into SDWIS and link them to the violation. Enter treatment data into SDWIS for "42" violators that have installed filtration. EPA will assist in identifying these water systems.	§142.15(a)(1) & (b)(2)		On-going.
1.3.6	Report **Public Notice (PN) violations** on a routine basis where appropriate.	§142.15(a)(1)		On-going.
1.3.7	Improve **reporting of VOC, SOC and IOC M/R**	§142.15(a)		On-going.

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	violations, particularly nitrate/nitrite monitoring violations			Transferred M/R responsibility to Central Office. All reports are now going into SDWIS.
1.3.8	For **new rules,** (CCR, PN, M/DBP, LCRMR) enter data into SDWIS. States not using SDWIS-State must develop the capability of reporting to SDWIS as per Extension/Implementation Agreements. For new rules which are in effect, but the state does not have Primacy, report information for EPA, Region III to make compliance determinations (see specific reporting needs in applicable Extension or Letter Agreements).	§142	as new modules become available. Non-SDWIS data should be reported by the dates specified in Agreements.	We are currently on SDWIS 7.0. We are expecting to install 8.0 as soon as we receive the new computers and server that we have on order. Should receive the hardware within 60 days, another 30 days for installation, so installation of 8.0 should take place shortly after that. **EPA** denotes commentary added by EPA Region III: Once the 8.0 version is installed and operational, WVDHHR will then be able to report on all new rules introduced with this new version.
1.4 State Specific Issues				
State Specific- West Virginia				
1.4.1	The Department of Health and Human Resources (DHHR) must evaluate their ground water PWSs for influence of surface water.	§142		GUDI evaluations are ongoing. **EPA** denotes commentary added by EPA Region III: See Task 2.1.4 for GUDI status.
1.4.2	DHHR should work to improve data management and reporting to SDWIS, particularly those areas identified in the final data verification report; regulation areas identified with discrepancy rates greater than 15% should be addressed first. Nitrate M/R data discrepancies were particularly high (more than 59% for CWS and 45% for TNCWS). DHHR should focus its effort on nitrate data first, followed by: IOC, VOC, SOC, LCR, radionuclides, and nitrate M/R violations and well as enforcement information reporting. Also, TCR M/R violation data for TNCWS contained a significant amount of discrepancies.	§142 SDWIS Reporting Guidance		In 2000, DHHR reorganized the Environmental Engineering Division, creating the Regulatory Development and Compliance Unit. All chemical reports are now sent to the Central Office, and the results entered into SDWIS/STATE data base, and the software is able to minimize the discrepancies. The discrepancies listed in the August 1997 Data Verification and those listed in the October 2002 report is evidence of the improved discrepancy rate through this modification in organization. **EPA** denotes commentary added by EPA Region III: Major progress achieved in

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				recruiting staff. Improvement has been made in overall program effort and tracking. GUDI status for 93% of all active/seasonal systems are complete. WVDHHR has been exceptional in staying on top of adopting new regulations as well as working with EPA in identifying violators prior to rule primacy and taking a proactive monitoring approach.
1.4.3	DHHR must ensure adequate certified laboratory capabilities for all parameters regulated under the State's primary drinking water regulations.	§142		No laboratory capacity problems have been identified.
1.4.4	DHHR must begin tracking Public Notice violations and enter all violations into SDWIS.	§142		On-going. **EPA** denotes commentary added by EPA Region III: State will report on this in 2003 report.
1.5Government Performance and Results Act (GPRA) State Reporting Measures and Key PWSS Program Performance Indicators GPRA Measures: Reporting for all but two measures is met by reporting the required quarterly SDWIS compliance data or through other reporting already done under other initiatives such as the Wellhead Protection Program reports. For information not already reported to EPA , reporting frequency is semi-annual. See Appendix B for the detailed list of objectives, sub-objectives and measures for the GPRA Requirements as well as all programs under EPA's Office of Water. The following are the GPRA State Core Performance Measures and Associated Reporting Requirements:				
1.5.1	1. # of community drinking water systems that will improve or maintain compliance with all health-based standards through the use of the Drinking Water State Revolving Funds. 2. # CWSs and population served that will comply with the CCR Rule not new, but omitted previously 3 % of the population served by community water systems that will receive drinking water meeting all health-based standards. * 4 # and % of community water systems (and population served) that will be implementing	GPRA	Semi-annual self-assessments. SDWIS data: compliance due quarterly, inventory due at	On-going. **EPA** denotes commentary added by EPA Region III: * Approx. 372 CWS serving a population of 1,182,308 has complied with the CCR Rule. * 99% of the CWS population were without violations reported to SDWIS-Fed. 128 CWS = 23%

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	programs to protect their source water. [See reporting matrix in PWSS Guidance Document] * [Tracked through SDWIS. No additional burden to States.]		least annually, but may be reported quarterly.	162,709 Population = 10% * Information for #2 and #3 was generated from SDWIS-Fed.
1.5.2	EPA Region III PWSS Key Performance Indicators - These targets will be negotiated with each State. FY '99 will serve as the baseline. [See Table in PWSS Guidance Document]		Semi-annual self-assessment (for items not reported to SDWIS*)	On-going. **EPA** denotes commentary added by EPA Region III: State will address this in 2003 report.
2.	**ACTIVITIES REQUIRED TO MAINTAIN PRIMACY [See elements of §§142.10, 142.12, 142.14, 142.15, and 142.16**			
2.0	**Data Management**			
2.0.1	Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), tracks water quality monitoring information, and calculates monitoring and reporting (M/R) and maximum contaminant level (MCL) violations for all rule implementation priorities.	§142.14(c)	Ongoing; Report quarterly to, and possibly request assistance from, the Region on the status of any new programming.	SDWIS/State is being used as our database management system with updates occurring annually.
2.0.2	Report all violations and inventory updates for all systems, and for all rule implementation priorities, to the Safe Drinking Water Information System (SDWIS)/Federal system (FED) Also report any problems in reporting to SDWIS/FED on time.	§142.15(a) & (b)	Quarterly, within 45 days from the end of each quarter.	Updates are reported for each quarter within the required 45 days.
	SDWIS/FED reporting includes the following activities: 2.0.2.1 Report all inventory updates with at least all of	§142.15(a) & (b)	Quarterly, within 45 days	On-going.

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	the mandatory reporting elements that determine grant eligibility. Refer to *Appendix A of the Consolidated Summary of State Reporting Requirements for the Safe Drinking Water Information System (SDWIS)* documentation, for the details on this reporting. **Effective date of revised reporting requirements was January 1, 2000.**		from the end of each quarter.	**EPA** denotes commentary added by EPA Region III: WVDHHR continues to report in a timely manner and addresses error reports.
	2.0.2.2 Report all M/R, MCL, Public Notification (PN), and treatment technique violations for all rules including M/R violations for unregulated contaminant monitoring. This activity includes tracking monitoring results, and recording violations for all community water systems (CWS), non-transient non-community water systems (NTNCWS), and transient non-community water systems (TNCWS).			
	2.0.2.3 Report all formal enforcement actions and successfully link them to all appropriate violations.			
	2.0.2.4 Report all variances and exemptions			
	2.0.2.5 Report all milestone information required under the regulations.			
	2.0.2.6 Report all required SWTR data (e.g., treatment codes for all surface water, purchased surface water, GUDI and purchased GUDI sources, seller's public water system identification (PWSID) number for purchased surface water and purchased GUDI sources, filtration reason codes, etc.)			**EPA** denotes commentary added by EPA Region III: WVDHHR continues to report in a timely manner and addresses error reports.
	2.0.2.7 Report compliance achieved, identify and correct erroneous data, and submit deactivation data to SDWIS/FED for all applicable systems, especially Significant Non-compliers (SNCs).			
2.0.3	Report any missing or previously unreported unregulated contaminant monitoring results data to SDWIS using the August 1994 State Reporting Guidance for Unregulated Contaminant Monitoring (Document number EPA-812-B-94-0010).	§142.15	Quarterly-- 45 days after the end of the calendar quarter (same schedule as compliance and	The unregulated contaminant monitoring was one of the contaminant groups that was assigned to the district offices. The chemical analyses were kept at the district offices and violations were issued if the system did not monitor for unregulated contaminants. The old

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			violation SDWIS data)	unregulated contaminant rule ended in 1999. A new unregulated contaminant monitoring rule went into effect in 2000; and those rules are being reported directly to EPA by the PWSs. WV DHHR is in the process of transferring the chemical files from the district offices to the central office. No attempt has been made to enter the old unregulated chemical data into SDWIS because the data is over four years old.
2.0.4	Plan for and make system programming changes to meet any changes to the reporting requirements that will be effective in FY 2001, FY 2002 or early FY2003. (Appendix A of Document EPA-812-B-95-001 summarizes all of the current reporting requirements.) Specifically, plan for new regulation reporting requirements in sufficient time to meet reporting deadlines of these new rules. [Also see Implementation Guidances for each new rule for details on data management/data reporting requirements]	§142.15	Quarterly	On-going. State has contract with Global Environmental to assist with installation and implementation guidance.
2.0.5	Verify and ensure the accuracy of SDWIS/FED data when SDWIS printouts are made available to the State.		As requested	Ongoing. Review SDWIS printouts when received.
2.1Compliance and Enforcement				
2.1.0	Complete Annual Compliance Report	1414(c)	July 1, 2001; July 1, 2002	Annual compliance report submitted by July 1, 2002.
2.1.1	Promote compliance with the regulations. Notifying all systems of regulatory requirements and responding to questions (this includes CWSs, NTNCWSs and TNCWSs), taking enforcement action against recalcitrant or noncompliant systems, providing technical assistance, and issuing waivers, variances and exemptions, where appropriate.			Ongoing. Send out regulatory requirement notifications to all water systems annually.
2.1.2	Maintain records of pertinent State decisions (e.g., filtration decisions, waiver determinations). Report to system files all responses to M/R and MCL violations in accordance with escalation procedures as negotiated in the State Compliance Strategy. Report to system files all documentation of informal enforcement activities.	§142.14		On-going.

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2.1.3	Provide reporting on SNC Target systems and enter the number of systems which the State will address with formal enforcement by February 15, 2001 and February 15, 2002. Please use the standard format supplied with target list.		Feb 15, 2001 & Feb 15, 2002 report to SDWA Branch	Ongoing. Reports submitted to EPA as required.
2.1.4Implement all PWSS Program Activities required by 40 C.F.R. § 142.15 & 142.16. Activities are listed as sub-activities, below, by National Primary Drinking Water Regulation (NPDWR).				
2.1.4.0	**SWTR:** Implement the entire rule for all system types, Conduct GUDI determinations for all remaining CWS not completed and all NCWS. Report in semi-annual self-assessment the number of filtration evaluations and the number of GUDI assessments completed		report to SDWIS	For completing GUDI determinations: CWS - June 29, 1994; NCWS - June 29, 1999; For reporting positive GUDI determinations to SDWIS (includes appropriate SDWIS source water code changes) - Quarterly. **EPA** denotes commentary added by EPA Region III: As of 03/04/02: All active/seasonal systems that have been evaluated - 96% CWS (188 systems); 93% NCNT (117 systems); 92.3% NCTWS (459 systems). Remaining PWS are systems that are unresponsive/orphan (90 systems total); waiting on data or have new supply intakes(55 systems total). Recent drought conditions in WV has slowed the progress in testing. **NOTE:** Current numbers have decreased due to systems becoming inactive and removed from inventory. Developing enforcement procedures to deal with orphan and non-responsive systems.
2.1.4.1	**TCR:** Implement the entire rule for all system types. Implementation includes: enforcing routine and repeat monitoring, making compliance determinations, conducting sanitary surveys, and reviewing sample site plans. Enforce additional routine monitoring the month following a positive sample.		Semi-annual self assessment	**EPA** denotes commentary added by EPA Region III: WVDHHR is fully implementing this rule.
2.1.4.2	**Phase II and V Rule** for nitrates and nitrites: Implement		Semi-annual	On-going.

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	the entire rule for all system types. Implementation includes: enforcing initial and follow up monitoring, making compliance determinations, and following up on violations.		self assessment	
2.1.4.3	**Phase II and V Rule** for Chronic Contaminants: Implementation includes making compliance determinations for monitoring that has been conducted, enforcing follow-up monitoring where results are greater than the MCL, and follow-up on MCL violations. States are also encouraged to make development and implementation of waiver programs a priority implementation activity. Enforce follow-up monitoring requirements where results are less than the trigger level. Enforce initial monitoring, and enforce follow-up monitoring where results are between the trigger level and the MCL.		Semi-annual self assessment	On-going.
2.1.4.4	**Lead and Copper Rule (LCR)** for all PWSs: Implement the entire rule for all systems. Enforce routine water quality parameter monitoring and additional lead and copper monitoring. Enforce public education for all systems		Semi-annual self assessment	On-going.
2.1.4.5	**All Other Currently Regulated Chemicals**: Take enforcement actions for all arsenic MCL and M/R violations. Enforce total trihalomethane monitoring and MCL violations. Enforce current radionuclide standards. Enforce monitoring for other contaminants. Enforce against systems with other MCL violations		Semi-annual self assessment	On-going.
2.1.4.6	**PN Rule**: Include public notification requirements in compliance assistance and enforcement actions that are taken on MCL, treatment technique, and M/R violations.		Semi-annual self assessment	On-going.
2.1.5	Revise the **State Compliance Strategy** to reflect previous changes in the Federal regulations, any new SNC definitions, State procedural or organizational changes, and State/U.S. EPA Enforcement Agreements. The revisions should also include updated timely and appropriate flow charts for TCR, total trihalomethane, radionuclide, Phase 2 and 5, SWTR, Lead Ban, and LCR violations and for the CCR [and other new rules] when available. The charts should trace the State's response from identification of a violation through the State's most	§142.11	As needed Semi-annual self assessment	On-going.

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	formal enforcement tools to final compliance.			
2.1.6	Screen data submitted by public water systems for evidence of data falsification, and take follow-up enforcement action as appropriate.		Semi-annual self assessment	On-going.
2.1.7	Certify that the responsible State agency (if not the drinking water program) continues to enforce the Lead Ban, through inspections and State enforcement actions.	§142	Semi-annual self assessment	On-going.
[2.1.8]	[Maintain records of tests, measurements, analyses, decisions, and determinations performed on each PWS to determine compliance with applicable drinking water regulations; sanitary surveys, enforcement actions, vulnerability determinations, etc.; make records available to the Regional Administrator upon request.]	§142.14		On-going.
2.2 Regulation Development and Authority Adopt all rules on schedule [as required by §142.12 and any Special Primacy requirements found at §142.16]. States are strongly encouraged to adopt rules within the two years deadline to avoid a crunch in future years. Complete all primacy application packages as specified in any applicable memorandum of agreement or extension agreement. Report on any major implementation issues or problems. Apply for extension of time to adopt new regulations within two years of promulgation. Region III prefers **at least a 3 month lead time** to complete Extension Agreements by this deadline. Also see EPA's Primacy Update binder, mailed to each State at the beginning of June 1999, for all of the primacy revisions to specific rules and new primacy requirements to be added as per SDWA 1996. **NOTE: All rule effective dates, primacy revision package/extension request dues dates are included in Appendix E of the PWSS Guidance Document.**				
2.2.1	Lead and Copper Rule Minor Revisions Revise the State rules so that they are as stringent as the minor revisions published on January 12, 2000 in the Federal Register. Revise the State's implementation plan for the Lead and Copper rule, as necessary.	§142.12 §142.16(d)	Ongoing, final due date is January 14, 2002 or request an extension.	Rules adopted Spring 2002. Extension Agreement: Dec. 31, 2002. **EPA** denotes commentary added by EPA Region III: Primacy Package submitted and currently under review by EPA Rule Lead.
2.2.2	Analytical Methods Rule Changes Revise the State rules so that they are as stringent as the analytical methods changes published on December 5, 1994, March 5, 1997 and December 1, 1999 in the Federal Register.	§142.12	Withing 2 years of promulgation	Rules adopted Spring 2002.
2.2.3	Consumer Confidence Report (CCR) - Revise State regulations to adopt CCR regulations. Obtain Governor's waiver of requirement for small systems to mail reports (if State chooses).	§142.12 §142.16(f)	August 21, 2000 or by date established in Extension Agreement, but no later than by August 21,	Rules adopted Spring 2002. Interim Primacy approval granted 9-11-02. **EPA** denotes commentary added by EPA Region III: Primacy package approved. Federal Register Notice published

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			2002.	04/17/03.
2.2.4	Complete development of Interim Enhanced Surface Water Treatment Rule and the Stage 1 Disinfectants and Disinfection By-Product Rule; [including the Technical Revisions of January 2001]. Provide copies of early drafts of State rules for EPA review and comment. [Submit final Primacy Revision Application] Includes: Conduct the disinfection profiling monitoring for systems that request assistance. Collect DBP applicability data from PWSs, if applicable (ICR systems and any other systems the state decides to require to submit the data). Review and approve methods for calculating logs of inactivation of viruses for the disinfection profiling for systems using chloramines or ozone for primary disinfection. Respond to requests for approval of three years of existing operation data for disinfection profiling purposes.	§142.12 §142.16(b), (g) & (h)	December 16, 2000 or submit Extension Request. Rule packages must then be submitted by date established in Extension Agreement, but no later than December 16, 2002.	On-going. Rules adopted Spring 2002 Extension Agreement: Oct. 31, 2002 Primacy applications submitted September 2002. **EPA** denotes commentary added by EPA Region III: Primacy package approved. Federal Register Notice published 04/17/03.
2.2.5	Adopt changes to regulations as required by the April 28, 1998 revisions to the Primacy Regulations: includes obtaining minimum administrative penalty authority, changes to the PWS definition and changes to the definition of emergency conditions requiring alternate water supply provision. Provide copies of early drafts of regulation changes to EPA Region III for review and comment. If requested, provide Attorney General's statement explaining how the state's administrative penalty authority meets the new federal minimum requirements.	§142.11	April 28, 2000 or if extension requested and granted, by the date established by the Extension Agreement, but no later than April 28, 2002.	All were completed by Sept. 30, 2001. **EPA** denotes commentary added by EPA Region III: EPA has approved these provisions with the CCR, IESWTR and D/DBP primacy package. Federal Register Notice published 04/17/03.
2.2.6	Maintain required statutory and regulatory authorities (those upon which primacy approval was based). Report on the status of any State reorganizations, and their effects on statutory or regulatory authorities, and on implementation. Report on any changes to statutory, regulatory or laboratory certification status of the State Primacy	§142.12	Report changes or potential changes in semi-annual self-assessment .	On-going. No changes since last report.

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	Agency.			
2.2.7	Adopt Public Notification Rule or request extension to the deadline.	§142.12 §142.16(a)	By May 6, 2002. or if extension requested and granted, by the date established by the Extension Agreement, but no later than May 6, 2004	Rules adopted Spring 2002. Extension Agreement: 02/28/03. **EPA** denotes commentary added by EPA Region III: Primacy revision application under review at EPA.
2.2.8	Submit Radon Rule MMM Letter of Intent [90 days from final rule promulgation]	§142	estimated as Late 2001	Final rules not promulgated.
2.2.9	Adopt Radon Rule or request extension	§142	estimated as Late 2003	Final rules not promulgated.
2.2.10	Enter into mutually agreed upon Letter Agreement for implementation of LT1.	§142	Late 2001 or early 2002	Letter of Agreement for Implementation signed May 1, 2002.
2.2.11	Prepare for and adopt the Radionuclides or request an extension [promulgated 12/7/00] Submit Primacy Revision Application or Extension Request to EPA.	§142.12 §142.16(l)	December 2002 or if extension requested and granted, by the date established by the Extension Agreement, but no later than December 2004.	Rules adopted Spring 2002. No extension request is anticipated. **EPA** denotes commentary added by EPA Region III: Primacy Package submitted and is under review by EPA Rule Lead. EPA Hdqtrs. response to a review still pending.
[2.2.12]	[Prepare for and adopt Arsenic Rule] promulgated 1/22/01 Submit Primacy Revision Application or Extension Request to EPA	§142.12 §142.16(j)	January 22, 2003	Rules adopted Spring 2002. No extension request is anticipated. **EPA** denotes commentary added by EPA Region III: Primacy Package submitted and is under review by EPA Rule Lead. EPA Hdqtrs. response to a review still pending.
[2.2.13]	[Prepare for new regulations to be promulgated in 2001 and 2002, with State rule adoption due 2 years later:	§142.12 and §142.16 as	within 2 years of	On-going.

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	Ground Water Rule, LT1, Filter Backwash Recycling Rule, Lt2/Stage 2 DBP, MTBE SMCL]	applicable	promulgation	FBRR adopted Spring 2002. No extension request is anticipated.
2.3Surveillance and Technical Assistance				
2.3.0	Maintain an adequate sanitary survey program. Document deficiencies found in the surveys and follow-up to correct these deficiencies within the State's authority. Please provide the number of CWSs, NTNCWSs, and NCWSs which are scheduled for sanitary surveys in FYs 2002 and 2003 in the State's workplan and provide an update on the number of surveys completed. Please report on any key survey deficiencies or issues at SNC systems. Report sanitary survey numbers and key survey deficiencies or issues in semi-annual self-assessment	§142.16	semi-annual self assessments	Systems' responses to deficiencies are tracked with follow-up contact to systems for assurance of implementation plans. No. of Class I Sanitary Surveys **Expected** to be Performed: EPA FY 03 / EPA FY 04 CWS (C) 166 / 128 NTNCWS (P) 5 / 7 TNCWS (N) 4 / 12 175 / 147 No. of Class I Sanitary Surveys **Actually** Performed Year-to-Date: EPA FY 02 CWS (C) 96 NTNCWS (P) 25 TNCWS (N) 81 202
2.3.1	Maintain adequate plan and specification review program to assure that design and construction of new and modified drinking water system facilities will be capable of complying with the drinking water regulations. Please provide an update on the number of reviews completed, or key problem areas in semi-annual self-assessment.	§142.10	semi-annual self assessments	320 water project plans reviewed. 259 Permits to Construct issued.
2.3.2	Maintain the capability to respond to emergency	§142.10	semi-annual	17 technical representatives have

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	circumstances and to ensure provision of potable drinking water under emergency circumstances. Please report on any ongoing emergency issues in self-assessment		self assessments	received emergency response training and will receive additional in-depth training.
2.3.3	Maintain a Quality Management System which includes an adequate laboratory certification program. Update the State Quality Assurance Management Plan for the PWSS Program. The State PWSS Quality Assurance Management Plan (QMP) documents the Standard Operating Procedures (SOP) and QA/Quality Control requirements for the laboratory and the PWSS quality assurance systems. The QMP will include management and organization regarding QA, descriptions of technical tools of QA for all program functions including: laboratory certification and SOPs; PWS compliance, inventory and monitoring data; personnel qualifications and training, and other information. Once approved, this plan replaces the former QA Program Plan. This plan is mandatory for all PWSS grant recipients.	40 C.F.R. §31.45 EPA Guidance–EPA QA/R2	Final QMP must be submitted to EPA by July 1, 1999, or 2% of PWSS grant will be withheld Updated annually	Revised QMP/QAPP submitted to EPA 8-02. **EPA** denotes commentary added by EPA Region III: EPA has given conditional approval until October 31, 2003.
2.3.4	Develop and update the Quality Assurance Project Plans (QAPP) for collection, transport and analysis of samples intended for developing information or data to be used for implementation of the PWSS Program. QAPPs are to follow EPA guidance on plan development. QAPPs are not necessary if State PWSS Program staff do not collect any samples in the implementation of the PWSS program.		Final QAPP must be submitted to EPA by July 1, 2000. Updated annually	State program staff do not collect samples in the implementation of the PWSS program. **EPA** denotes commentary added by EPA Region III: Combined QMP/QAPP submitted and approved before deadline.
[2.3.5]	[Establish and maintain a state program for the certification of laboratories conducting analytical measurements of drinking water; assure availability to the state of laboratory facilities certified and capable of performing analytical measurements of all contaminants.]	§142.10(b)(3) & (4)		Conducted by Office of Laboratory Services. **EPA** denotes commentary added by EPA Region III: Lab certification completed 12/31/02. State staff encouraged to complete PT sample studies and repeat any analysis that are unacceptable in make-up studies in 2003.
2.4	**Program Management**			
2.4.0	Prepare a preliminary FY 2002 and FY 2003 grant	40 C.F.R. Part 31	July 1, 2001	Grant applications submitted as required.

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	application(s) which addresses all applicable required grant elements, and submit all required grant forms and supporting documentation.		(and July 1, 2002 if State does not elect to apply for a two year project and budget period. In this case, however, minor revisions and additional budget pages may still be needed.)	
2.4.1	Prepare and submit a final FY 2002 and FY 2003 grant application which addresses all Region III comments on the preliminary draft plan, including all budget documentation and supporting information.	40 C.F.R. Part 31	August 1, 2001 (and August 1, 2002 if State does not elect to apply for a two year project and budget period. In this case, however, minor revisions and additional budget pages may still be needed.)	Completed.
2.4.2	Prepare and submit a semi-annual self assessment which reports State progress in meeting State program plan commitments to the Region. Entails reporting on all activities as identified in the work plan including those performed by the recipient, by contractors and through interagency agreements. Self assessment shall include: a progress summary, justification for any outputs not submitted in accordance with the agreed upon schedule, and a discussion of anticipated program problems in the upcoming quarter(s). The first status report should contain a listing of each milestone (output) and their schedule completion dates for all proposals	40 C.F.R. §31.40 §142.15	May 15th and November 15th 2001 for FY '01 May 15th and November 15th 2002 for FY'02	On-going. Reports submitted as required.

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2.4.3	Provide a Final Financial Status Report documenting FY 2001 and FY 2002 expenditures so that the FY 2002 and FY 2003 PWSS grants can be processed. If State elects to apply for a two year budget and project period, FY 2002 FSR will be an interim submittal.	40 C.F.R. Part 31	December 31, 2001 for FY 2001 expenditures; December 31, 2002 for FY 2002 expenditures. The FY 2002 FSR will be an interim FSR if State is on a two year budget and project period.	On-going. FSR for FY 01 submitted. FSR for FY 02 submitted. **EPA** denotes commentary added by EPA Region III: FSR for FYs 01 and 02 have been closed out by OGMB.
[2.4.4]	Maintain records	§142.14		Ongoing.
3	**Activities Required to Receive Entire Drinking Water State Revolving Loan Fund (DWSRF) Program Allocation** ***Note: Section 3 is included in this Generic PWSS Guidance for additional background information and to help describe the full breadth of the SDWA programs. If any state activity to meet requirements outlined here in Section 3 are funded under the DWSRF set-aside funds, they should not appear in your PWSS Program grant workplan. See additional National and Regional Guidances for more details on DWSRF applications.*** ***The activities under Sections 3.0, 3.1 and ~~3.1~~ 3.2 are required to receive the entire DWSRF Program Allocation. The activities under Section ~~3.2~~, 3.3 Source Water Protection, are not required to receive DWSRF funds. However, if the State wishes to adopt alternative monitoring requirements, the State must have an approved source water protection program, and the State can use DWSRF funds to conduct source water assessments.***			

3.1Capacity Development

<u>Background Notes:</u>

The State had until September 30, 1999 to obtain legal authority or other means to ensure that all new CWSs and new NTNCWSs that commence operation after October 1, 1999, demonstrate technical, managerial, and financial, (TMF) capacity with respect to the NPDWRs. Twenty percent of a State's allotment would have been withheld beginning October 1, 1999 for FY'00 funds. In the fiscal years following a state's initial documentation of a fully functional program, a state must document that it is requiring a demonstration of technical, managerial, and financial capacity by every new CWS and every new NTNCWS to avoid withholding of 20% of its DWSRF allotment. [1452(a)(1)(G)(i) and 1420 (a), and page 15 of the February 28, 1997 DWSRF Guidelines.]

The State has until August 6, 2000 to develop and begin implementing a strategy to assist existing PWSs in acquiring and maintaining technical, managerial, and financial capacity, otherwise 10% of the FY '01 DWSRF funds allocated to the State will be withheld. In the fiscal years following a state's initial documentation of a fully functional program, a state must document that it is implementing its strategy to avoid withholding of 15% of its FY'02 DWSRF allotment and 20% in each subsequent year. [1452(a)(1)(G)(i) and 1420 (c), and page 16 of the February 28, 1997 DWSRF Guidelines.]

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3.1.0	**Capacity Development Authority (New Systems)** SDWA Section 1420 Legal authority must be effective by October 1, 1999 to ensure that new systems (CWSs and NTNCWSs) have technical, managerial, and financial capacity. The DWSRF 20% withholding provision began on October 1, 1999 for FY '00 funds. The withholding provision will continue into each successive FY until authority is obtained and is being implemented. The state's program will be evaluated annually as of October 1, the first day of the FY. The withholding occurs at the time of the DWSRF award for those FY funds. COMMENT: West Virginia initially provided documentation of adequate regulatory authority through a certification provided by the WV Attorney General's Office dated November 30, 1998. On April 19, 1999 the U. S. EPA determined that the West Virginia program met EPA guidance and statutory requirements. West Virginia's authority for the WV Bureau for Public Health to regulate water systems to ensure adequate technical, managerial and financial capacity is contained in WV Code §16-9(a) and §16-13C-3(a). There have been no changes to this authority since October 1, 1999.			
3.1.0.1	Annual Review and Reporting on New System Demonstration of TMF: In the fiscal years following a state's initial documentation of a fully functional program, **a state must document that it is requiring a demonstration of technical, managerial, and financial capacity by every new CWS and every new NTNCWS.** Documentation could consist of summary statistics regarding the number of proposed new CWSs and NTNCWSs and the results of their required capacity demonstrations. [Documentation should also address methods used to evaluate and verify program implementation.] Each progress report (mid-year and end-of-year) should include: • Number and list of approved new CWSs and NTNCWSs • Number and list of new CWSs and NTNCWSs (commencing operation after October 1, 1999) that are not in compliance	SDWA Section 1420	with a given year's capitalization grant application; in the semi-annual self assessment; or in an entirely separate submittal. semi-annual self assessments	Four (4) new systems were proposed during FY 2002. Both systems were required to complete form EW-100, "Addendum Capacity Development Questionnaire." Upon review of the completed questionnaires, it was determined the systems had adequate capacity and the Permit to Construct was issued.

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	See PWSS Guidance, Appendix F for a sample reporting format.			
3.1.1	**Capacity Development Strategy (Existing Systems)** [1452(a)(1)(G)(i) and 1420 (c), and page 16 of the February 28, 1997 DWSRF Guidelines.] **Background Notes:** The State has until August 6, 2000 to submit and begin implementing a strategy to assist PWSs in acquiring and maintaining technical, managerial, and financial capacity, otherwise 10% of the FY '01 DWSRF funds allocated to the State will be withheld. In the fiscal years following a state's initial documentation of a fully functional program, a state must document that it is implementing its strategy to avoid withholding of 15% of its FY '02 DWSRF allotment and 20% in each subsequent year. In preparing their capacity development strategies, the State must consider, solicit public comment on, and include as appropriate the following: A. The methods or criteria that the State will use to identify and prioritize the PWSs most in need of improving technical, managerial, and financial capacity. B. A description of the institutional, regulatory, financial, tax, or legal factors at the Federal, State, or local level that encourage or impair capacity development. C. A description of how the State will use the authorities and resources of this title or other means to assist public water systems in complying with NPDWRs, encourage the development of partnerships between public water systems to enhance the technical, managerial, and financial capacity of the systems, and assist public water systems in the training and certification of operators. D. A description of how the State will establish a baseline and measure improvements in capacity with respect to NPDWRs and State drinking water law. E. An identification of the persons that have an interest in and are involved in the development and implementation of the capacity development strategy (including all appropriate agencies of Federal, State, and local governments, private and nonprofit PWSs and PWS customers)." Unless the State has developed (including addressing elements A through E listed above) and is implementing a capacity development strategy by August 6, 2000, the State will receive only: • 90 percent of DWSRF allocation for fiscal year 2001; • 85 percent of DWSRF allocation for fiscal year 2002; and • 80 percent of DWSRF allocation for each subsequent fiscal year. **COMMENT:** Strategy was completed and submitted to EPA in August 2000 and was subsequently approved September 2000. WV has been implementing the strategy since submission (see other items related to Strategy Implementation and Reporting).			

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3.1.1.1	Initial Documentation of Strategy for Existing Systems: The State must document that it has and is implementing a capacity development strategy for existing systems. The documentation must include the following: • The State must certify that it solicited public comments on the five elements listed above as part of the preparation of its capacity development strategy. The State must describe relevant public comments and its responses to them. • The State must describe which of the listed elements (A-E) the State has included or excluded from its strategy, and why each element was included or excluded. • The State must describe how the selected elements together can be rationally considered to constitute a strategy to assist PWSs in acquiring and maintaining technical, managerial, and financial capacity. • The State must describe how it will implement its strategy and evaluate its progress toward improving PWS capacity.	SDWA Section 1420(c)	The State must document that it has and is implementing a capacity development strategy for existing systems by August 6, 2000	Strategy was completed and approved September 2000. Annual reports documenting implementation of strategy were submitted to EPA in November 2000, November 2001 and November 2002.

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3.1.1.2	Annual Review and Reporting for existing system implementation: In the fiscal years following a state's initial documentation of a fully functional program, a state must document that it is implementing its capacity development strategy for existing systems. • Each year, as a stand-alone submittal; as part of the semi-annual self assessment; or as part of the state's capitalization grant application, the state must provide documentation showing the ongoing implementation of their capacity development strategy. • Such documentation may consist of a concise narrative description of the major activities being conducted and planned for under the state's capacity development strategy.	SDWA Section 1420	A state must document its on-going implementation of its capacity development strategy for existing systems for EPA withholding decisions to be made as of October 1 of each successive FY.	Annual Report submitted to EPA in November 2002. The Report documented implementation of the strategy.
3.1.2	**Other Annual Review and Ongoing Reporting Requirements:**			
3.1.2.0	Submit, and periodically update, a list of CWSs and NTNCWSs that have a history of significant noncompliance (SNC) and, to the extent practicable, the reasons for their noncompliance.	1420(b)	June 15, 2000. This activity repeats every three years.	Completed June 15, 2000.
3.1.2.1	Submit a report on the success of its enforcement mechanisms and initial capacity development efforts in helping CWSs and NTNCWSs having a history of significant noncompliance improve their capacity. [Issues to be addressed include: What are the enforcement and compliance mechanisms that have worked best in helping systems in significant noncompliance return to compliance? How do the States see their capacity development strategy helping systems with a history of significant noncompliance achieve and maintain technical, managerial, and financial capacity? What barriers does the State program face that limit the	SDWA 1420(b)(2)	August 6, 2001	Report was completed and submitted August 2001; approved by EPA November 2001.

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	effectiveness of either enforcement or capacity development as tools to help systems with a history of significant noncompliance?]			
3.1.2.2	No later than 2 years after a State adopts a capacity development strategy, and every 3 years thereafter, the primacy agency must submit a report to the Governor on the efficacy of the strategy and progress made toward improving the technical, managerial, and financial capacity of PWSs in the State. The report shall also be made available to the public.		2 years after a State adopts a capacity development strategy, and every 3 years thereafter.	The "Report to the Governor" was completed and submitted by the September 30 deadline.
3.2	**Operator Certification Programs**			
3.2.0	According to the Guidelines, States planning on submitting their existing Operator Certification Programs to EPA as 'substantially equivalent' must do so by August 5, 2000.	2/5/1999 Guidelines	Submit Program to EPA by August 5, 2000 (substantially equivalent)	Not applicable.
3.2.1	States that need to amend their existing **Operator Certification Programs** to meet the Guidelines must have this process underway in FY 2000. To avoid the 20% SRF withhold, States must adopt and be implementing Programs that meet the baseline requirements of the Guidelines by February 5, 2001. Begin Program review and amendment process to meet Guidelines (EPA still expects to issue a Federal Register Notice on these requirements in 2001)	2/5/1999 Guidelines	February 5, 2001, to avoid 20% SRF withhold.	Program approved 2-20-02. Ongoing. Monthly meetings to review & evaulate courses to eliminate inconsistencies and subjectivity among personnel and ensure compliance with federal / state regs. Agreement reached with WV Bd of Education to assist in validation of exams and training tasks. Attend various courses sponsored by the WV Public Service Commission, WV Rural Water Association, Environmental Training Center, to improve & update our knowledge. Coordinate with other state agencies to help provide and support training. Develop calendars of all training & testing.

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				Purchased training videos, and water & wastewater operator math textbooks. Purchased automated computer grading systems. Prepare and distribute every 2-3 months a Division newsletter called "Drips & Drops."
3.3	**Source Water Assessment and Protection** ***Background Notes:*** ***Source water assessments are required of primacy States, if the State chooses to adopt alternative monitoring requirements under 1428(b). The State must obligate (but not expend) its grant funds to delineate and/or complete source water assessments within 4 years after the State receives its grant. [1452(k)(1)(C), and pages 22-23 of the DWSRF Guidelines.] In addition, up to 10 percent of the FY 1998 funds can be set aside to administer or provide technical assistance through source water protection programs.***			
3.3.0	Implement State Source Water Assessment Program (SWAP) Plan, and report progress to EPA in semi-annual PWSS reports. Include copies of contract agreements, MOUs, etc. with other agencies and contractors. Report relevant activities underway. Discuss any significant barriers to implementation with EPA as soon as possible. [Submit Source Water Assessment and Protection Reporting matrix annually for CWS/NTNCWS/TNCWS]	1453(a)(3) GPRA for CWS	semi-annual self-assessments, (or other mutually agreed upon dates, such as alternate DWSRF setaside reporting dates)	Activities underway: Submitted annual 2001-02 matrix to EPA. 1) WV DHHR has issued 3 SWAP contracts for 54 community surface systems to be completed by March 2003. 2) WV DHHR has issued 2 contracts for 28 community groundwater systems to be completed by February 2003. 3) USGS hydrogeological study along the Ohio River is continuing. 4) WV Div of Environmental Protection Class V well study is continuing.
3.3.1	Optional: Develop and submit a State source water quality protection partnership program. Evaluate local petitions.	1454(a)(1)	semi-annual self assessments	May submit a protection partnership program in the future.
3.3.2	Optional: Develop and submit an application for State ground water protection program assistance.	1429(c)(1)	semi-annual self	WV has an approved Wellhead Protection Program that helps protect the

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			assessments	groundwater drinking water sources in the state.
3.3.3	Optional: Adopt interim alternative monitoring requirements, as appropriate, for PWSs with a completed source water assessment.	1418(a)(1)		Alternative monitoring requirements have not been implemented. **EPA** denotes commentary added by EPA Region III: WVDHHR would like written approval of plan from EPA prior to implementation. Specific review will be incorporated in the 2003 evaluation report.
4.	**Recommended Activities (These are activities that do not affect PWSS Primacy or the receipt of Drinking Water State Revolving Loan Funds)**			
4.0	Report system street address information and the latest sanitary survey information to SDWIS, including sanitary surveys at Federal facilities. Please also report owner type codes, so that Federal facilities can be identified, and service area category information codes, so that schools, mobile home parks, etc., can be identified. Please submit complete and accurate source information. (Refer to Federal Reporting Data System (FRDS)/SDWIS documentation for the details on this reporting.) Please provide complete treatment process and treatment objective codes so that source waters requiring treatment beyond conventional treatment to address source water quality problems can be identified in 305(b) water quality assessments, and the Index of Watershed Indicators.	SDWIS reporting Guidance	Quarterly to SDWIS	On-going.
4.1	Enter informal enforcement actions to SDWIS to present a more complete picture of violation follow-up.		Quarterly to SDWIS	Currently use only formal enforcement actions.
4.2	Enter or correct latitude/longitude information to SDWIS for any remaining systems. Enter or correct the information on surface water systems first. Priorities for entering data for the remaining systems are groundwater CWSs next, then groundwater NTNCWSs, followed by TNCWSs. Coordinate, as appropriate, with the EPA data management staff to ensure that all needed data storage capabilities for source water protection efforts are accounted for in the modernized EPA STOrage and RETrieval system (STORET), EPA's data management		Quarterly to SDWIS	Ongoing: SWAP contractors are continuing to acquire Lat / Long data for surface water and ground water systems' intakes and plant locations. All location data updates are expected to be completed by end of calendar year 2003.

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	program for ambient water quality. Also coordinate with State Clean Water Act and EPA staff to strengthen State georeferencing capabilities to better track monitoring information for mapping and GIS applications. GIS tools, including the Reach File 3 system that assigns unique location identifiers to the waters of the U.S., will be valuable in source water assessments.			
4.3	Develop and maintain a cross connection control program	§142	semi-annual self assessments	Initiated a 36-hour Cross Conneciton and Backflow training / inspector / tester course.
4.4	Interact with other State programs, tribal, and local governments, and other stakeholder groups that affect or are affected by the drinking water program (e.g., wellhead protection programs, watershed protection programs).		Quarterly to SDWIS	On-going. Interact with other state and federal programs, local governments and other stakeholders through the WV Watershed Framework, Wellhead and Source Water Assessment committees, local source water protection programs and other stakeholder groups that help protect the groundwater drinking water sources in the state.
4.4.0	Plan for source water protection and source water assessment programs simultaneously. For example, use current information on the hydrology and hydrogeology of different regions of the State to determine the degree of detail appropriate for the source water assessments. These assessments are necessary to support the source water protection programs being considered. Protection programs will likely be necessary in order to provide local flexibility on monitoring relief, ground water disinfection, regulation of Class V underground injection control wells, and filtration.		semi-annual self assessments.	Ongoing. West Virginia Wellhead Protection Program helps guide local drinking water protection efforts and awareness.
4.4.1	Participate in State implementation of the 305(b) guidelines for drinking water to elevate awareness of drinking water as a designated use within the 305(b) program, increase the percentage of waters assessed for drinking water use support, and enhance the accuracy and value of the assessments. Facilitate a working relationship between the State drinking water and clean water staff to provide the most accurate and representative assessment of source waters, based on available data which the State believes best reflects the quality of the resource. Work with State water quality standard staff to		semi-annual self assessments.	Staff of the Bureau for Public Health has developed a working relationship between the State's SDWA Program, Water Quality Board, Watershed Framework Committee and Clean Water Act Program to provide the most accurate and representative assessment of source waters, based on available data which the State believes best reflects the quality of the resource.

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	ensure that use designations under the Clean Water Act reflect the location of surface source water areas for drinking water intakes, and wellhead protection areas which may be influenced by surface water (i.e., induced infiltration of surface water into drinking water wells). Also, work cooperatively with State ambient monitoring staff, including the 305(b) staff, to ensure that duplication of monitoring efforts in source water assessment projects are not occurring, that existing data are recognized and used, and that any new data that are collected are appropriate. EPA Region III will assist in the use of STORET date as needed.			Participates with the USGS and WV Division of Environmental Protection on the ambient groundwater monitoring program.
4.5	Coordinate with national, State, and local agencies to encourage identification and reporting of waterborne disease outbreaks associated with drinking water.		semi-annual self assessments.	On-going.
4.6	Encourage systems to optimize their treatment plant performance beyond current requirements.		semi-annual self assessments.	On-going.
4.7	Perform public education responsibilities, such as responding to press inquiries, educating the general public, and conducting outreach.		semi-annual self assessments.	On-going.
4.8	Obtain Internet access to improve communications with other agencies, and outreach to the public. Develop computer communications with field offices.		semi-annual self assessments.	Currently have Internet access.
4.9	Track the following compliance assistance activities: small system assistance programs, workshops, onsite assistance, guidance on State regulations and other outreach materials, hot lines or other responses to inquiries from individuals, trade shows, and conferences. **Note:** The Office of Enforcement and Compliance Assistance at Headquarters is interested in State compliance assistance efforts. Please provide whatever information is easily available, or that does not require extensive time and resources to collect. (This type of information should also be included in the State's Annual Compliance Report, due each July 1 for the previous calendar year.)		semi-annual self assessments.	WV Rural Water Association workshops, agency newsletters, and the American Water Works Association provide applicable information. OEHS staff are often presenters at these meetings.
4.10	Water Conservation Guidelines: On August 6, 1998, EPA published a document entitled "*Water Conservation Plan Guidelines*." These voluntary guidelines will encourage conservation by water systems, particularly small systems,		semi-annual self assessments.	Capacity Development assessments encourage systems to control water loss through leak and/or inadequate metering.

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	thereby extending the life of water treatment infrastructure and reducing costs. The guidelines do not contain any federal requirements; however, after August 6, 1999 states and Indian Tribes may require water systems to submit a water conservation plan consistent with EPA's guidelines as a condition of receiving a loan from a State Drinking Water Loan Fund.			
4.11	Drought Contingency and Water Supply Assistance: Continue to monitor water systems affected by drought conditions to ensure an adequate supply of water. Assist water suppliers with obtaining alternate sources, handling any contamination associated with the drought, development of contingency plans and assisting with outreach efforts on water conservation.		semi-annual self assessments.	On-going. Technical representatives monitored and assisted those water systems that experienced severe raw water shortages during summer drought.
5	**Additional State Activities: Include here any additional projects funded under the PWSS grant. You may also want to use this area to track equipment purchases, staff hiring, etc. or do so on a separate page.**			

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