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

FY 2003 YEAR END PROGRESS REPORT

This Guidance attempts to capture all of the tasks which make up a state's drinking water program, whether for Primacy purposes under the Safe Drinking Water Act or those activities which could be funded with the DWSRF set-aside funds.

This Guidance attempts to capture activities for two years for those states wishing to develop two-year workplans and PWSS applications reflecting a two-year budget.

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A change that you will notice about this Guidance is that several columns have been eliminated; however, the information has been incorporated into remaining columns. This allows the comment column to be expanded for reporting purposes. **All reporting is considered to be via the semi-annual self-assessments, unless noted otherwise.**

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PUBLIC WATER SYSTEM SUPERVISION PROGRAM GUIDANCE AND REPORTING CHECKLIST

Task #	Activity (Also notes statutory/regulatory citations)	Due Date / Reporting	Progress Reporting and Additional Comments
1.	**New Focus Activities for FY '03-04** **These are the activities which need special emphasis during the year due to their importance or due to a regulatory deadline. These are listed here to capture your attention. These activities should not reduce the focus placed on responding to acute health contaminants at all public water systems.** · **Continuation of Emergency Preparedness/Increased Security Activities with both state staff and public water suppliers, including responding to threats and emergencies.** · **New Rule Development and adoption or submission of extension requests. Implementation of new federal rules to the extent possible under state regulations and as per Extension Agreements.** · **State Specific Activities** · **Enhancement of Operator Certification Programs through the Expense Reimbursement Grant Program** · **Continuation of improve Quality Systems and documentation of these systems, including revisions to QMPs and/or QAPPs as necessary due to the adoption of new regulations.** · **Completion of Source Water Assessments** **The reporting on these activities should be done in the corresponding section of this Checklist.**		
2.	**Activities Required to Maintain Primacy See elements of §§142.10, 142.12, 142.14, 142.15, and 142.16**		
2.1	**Data Management**		
2.1.1	Participate in and follow-up to EPA **Data Verification Audit findings.** State will address major findings of the report and report to EPA on its activities to prevent future occurrences. State specific issues from 2002 Report will be addressed in a. thru p. of this section.	Next data verification audit planned for 2004.	On-going. Data verification audit conducted June 2002. Final report done October 2002. State continuing to implement corrections and improve data management.
2.1.1.a	Train staff to interpret and review monthly operating reports (MORs) for the SWTR. Report on progress.	Report on progress in semi-annual self assessments	On-going as changes are made for IEWSTR and LTIESWTR.
2.1.1.b	Check to ensure all required chlorine residual and turbidity samples are collected properly at required frequency, and are being reported on		Personnel are checking this information upon receipt of MOR.

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	time.		
2.1.1.c	Monitor high chlorine residuals more closer in light of the upcoming rules: IESWTR and DBPR.		Beginning May 2003, entering chlorine residuals into SDWIS.
2.1.1.d	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.		SDWIS/State 8.0 installed approx. May 1, 2003 which has the ability to track Public Notifications. As PN is received, it is logged into SDWIS/State. Violations for failure to provide PN entered into SDWIS.
2.1.1.e	Central Office should institute tracking system for radiological contaminants.		When the new rule goes into effect (January 2005), SDWIS/State will help track submission of samples.
2.1.1.f	Submit all ALEs for LCR to SDWIS/Fed.		On-going
2.1.1.g	Work w/ EPA to correct 1995 data in SDWIS/Fed (total replace file vs DTF writer) Mostly Phase II/V violation data errors.		On-going; expect to have corrections completed by 2nd quarter 2003.Corrections made and completed
2.1.1.h	Address all missing/incorrect data in SDWIS/Fed e.g., lat/long and source treatment flag status.		On-going
2.1.1.i	Work with Philippi office to develop a more user friendly SDWIS/State change form.		Planning to have all districts make changes to SDWIS and climatic change form at some future date. Philippi currently entering data directly into SDWIS. Other districts will enter data directly into SDWIS as they are trained.
2.1.1.j	Make concerting efforts to lend technical support for SDWIS/State to Phillippi Office.		Training on use of SDWIS 8.0 is to be scheduled for all district offices. Wheeling D.O. received training. All other D.O. to receive training during first half of FY04. All offices have received SDWIS 7.0 training.
2.1.1.k	Standardize form laboratories use to display results.	Report on progress in semi-annual self assessments	Office of Laboratory Services would have to require this. Electronic Data Interchange is currently being implemented to eliminate manual data entry.
2.1.1.l	Make sure all name, address, admin. contact and PWSID info. is reported.		On-going
2.1.1.m	Report all "28" violations to SDWIS/Fed for failure to conduct sanitary survey or conducting them late.		There should be no "28" violations since Engineering Division conducts all Sanitary Surveys.
2.1.1.n	Make sure PWSIDs for water sources are consistent through inactivation and reactivations. Correct all data to reflect original PWSID		On-going

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	assigned.		
2.1.1.o	Work with PWSs to correctly identify routine and repeat samples for TCR.		Certified operator training identifies TCR sample types. District Offices provide notification to PWS of repeat/replacement sampling requirements.
2.1.1.p	Focus more on VOC and SOC results to detect results greater than the MDL.		Moving the tracking from manual to SDWIS/State should eliminate those errors. Currently all tracking and compliance determinations made using SDWIS/State
2.1.1.q	Conduct follow-up quarterly monitoring to determine if systems are reliably and consistently below the MCL.		Moving the tracking from manual to SDWIS/State should eliminate those errors. Currently all tracking and compliance determinations made using SDWIS/State
2.1.1.r	Status must enforce LCR sampling of every 3 years. Report on status of getting systems back on schedule for sampling every 3 years.		Only 1.2% of our water systems on triennial Pb/Cu sampling neglected to sample during their 3-year monitoring period. We will continue to work with the systems not in compliance.
2.1.2	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)	Report quarterly to EPA requesting assistance on status of any new programming	SDWIS / STATE is being used as our database management system with updates occurring annually.
2.1.3	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)	Report quarterly (within 45 days of the end of each quarter)	Updates are reported for each quarter within the required 45 days. Commitment to data management improvements. Currently focusing on deficiencies noted in data verification report.
2.1.4	SDWIS/FED reporting includes the following activities: a. Report all inventory updates with at least all of the mandatory reporting elements that determine grant eligibility. Refer to *Appendix A of the Consolidated Summary of State Reporting*		On-going.

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	Requirements for the Safe Drinking Water Information System (SDWIS) documentation, for the details on this reporting.		
2.1.5	b. 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). **WV DHHR should pay particular attention to the Public Notices for non-MCL and TT violations.**		Ongoing.
2.1.6	c. Report all formal enforcement actions and successfully link them to all appropriate violations. d. Report all variances and exemptions e. Report all milestone information required under the regulations. f. 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.)	Report quarterly, (within 45 days from the end of each quarter	On-going.
2.1.7	g. Report compliance achieved, identify and correct erroneous data, and submit deactivation data to SDWIS/FED for all applicable systems, especially Significant Non-compliers (SNCs).		
2.1.8	Plan for and make system programming changes to meet any changes to the reporting requirements that will be effective in FY 2003, FY 2004 or early FY2005. (Appendix A of	Report quarterly	On-going.

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	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		
2.1.9	Verify and ensure the accuracy of SDWIS/FED data when SDWIS printouts are made available to the State.	As requested	Review SDWIS printouts when received.
2.1.10	**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)	Report quarterly, (within 45 days from the end of each quarter	On-going.
2.1.11	**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	On-going. **<u>NOTE:</u>** §2.1.12, 2.1.13 and 2.1.14 apparently are "write protected" therefore, our comments for those items will be entered here. **2.1.12** Enforcement action codes and actual treatment data is routinely entered for all violation codes. **2.1.13** Installation of new version of SDWIS/State will allow us to determine and track PN violations. **2.1.14** Reviewing each PWS file and determining current status, followed by developing appropriate monitoring schedules to be entered into SDWIS/State concurrently sending the schedule to the system.
2.1.12	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)		
2.1.13	Report **Public Notice (PN) violations** on a		

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	routine basis where appropriate. §142.15(a)(1)		
2.1.14	Improve **reporting of VOC, SOC and IOC M/R violations**, particularly nitrate/nitrite monitoring violations. §142.15(a) **Now that Central Office has M/R responsibility, give detail comments on improvements since the 2002 DV**.	On-Going	
2.1.15	For **new rules,** (FBRR, LT1) 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). **Report on status of installation of SDWIS 8.0 version. If not installed, explain how data is being tracked for new rules and when new version is expected to be installed.**	As new modules become available. Non-SDWIS data should be reported by the dates specified in Agreements.	On-going. Revised state Public Water Systems Regulations currently submitted for adoption by 2004 legislative session to adopt by reference rule promulgated by EPA after April 17, 2002.
2.1.16	**Lead and Copper Rule Minor Revisions (LCRMR) -** SDWIS-FED will no longer accept data which does not meet the new LCRMR reporting requirements. States not using SDWIS-State must report data in accordance with new requirements. States using SDWIS-State will report in accordance with revised modules.	Report in accordance with revised modules.	Began reporting new method May 15, 2001.
2.2 Compliance and Enforcement including Implementation of all PWSS Program Activities required by 40 C.F.R. §§142.15 & 142.16. Activities are listed by general first and then by National Primary Drinking Water Regulation (NPDWR).			
2.2.1	Complete Annual Compliance Report by July 1st, for previous calendar year. SDWA Section 1414(c)	July 1st	Report filed July 2003.
2.2.2	Promote compliance with the regulations. Notifying all systems of regulatory requirements and responding to questions (this includes CWSs,	Report Semi-annually	On-going.

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	NTNCWSs and TNCWSs), taking enforcement action against recalcitrant or noncompliant systems, providing technical assistance, and issuing waivers, variances and exemptions, where appropriate. **Give detailed comments <u>if possible</u> on what specific actions have been taken to promote compliance.**		
2.2.3	Maintain records of pertinent State decisions (e.g., filtration decisions, waiver determinations, public notification provisions). 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	
2.2.4	Provide responses on SNC systems, on a quarterly basis using the standard format supplied with quarterly lists, to the SDWA Branch. Work with EPA SNC Coordinator to determine why problems are occurring and take steps to correct. Stay on Febuary 15th schedule.	Feb. 15, 2003 and Feb. 15, 2004	On-going.
2.2.5 Government Performance and Results Act (GPRA) State Reporting Measures and Key PWSS Program Performance Indicators GPRA Measures: Reporting is met by reporting the required quarterly SDWIS compliance data or through other reporting already done under other initiatives such as the Source Water Matrix or Wellhead Protection Program reports. For information not already reported to EPA, **reporting frequency is semi-annual**. The following are the GPRA State Core Performance Measures and Associated Reporting Requirements:			
A.	# CWSs and population served that comply with the CCR Rule	N/A	This information is tracked in SDWIS. No additional reporting burden to state. The Goal is included here FYI. The Goal has always been to reach 100%.
B	# and % of the population served, community and nontransient noncommunity water systems that receive drinking water meeting all health-based standards.		This information is tracked in SDWIS. No additional reporting burden to state. The Goal is included here FYI. The Goal has always been to reach 100%.
C	**EPA Region III PWSS Key Performance**	N/A	This information is tracked in SDWIS. No additional

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	Indicators - These targets will be negotiated with each State. FY'01 will serve as the baseline for the FY'03-'04 timeframe. See Table in PWSS Guidance, Appendix F. **Submit key performance indicators for 2002 and 2003.**		reporting burden to State. The goal is to complete all reporting via SDWIS.
2.2.6	**SWTR:** Implement the entire rule Complete GUDI determinations for all CWS and all NCWS as per negotiated deadlines since regulatory GUDI determination deadlines have past: CWS - June 29, 1994; NCWS - June 29, 1999 **Report** in semi-annual self-assessment the number of filtration evaluations and the number of GUDI assessments completed and expected timeframe for completion of remainder. Source type changes should be recorded in SDWIS. Deadlines to install filtration must be met. **Give status of %s for active/seasonal systems and unresponsive/orphan systems.**	Semi-annual self-assessment; SDWIS **TO DO**: for states with new schedules for completion, edit the dates to reflect what's in the schedule	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. As of 9/30/03: 94.3% of the community water systems (214 systems); 87.7% of the active/seasonal NCNT (146 systems) and 84.3% of NCT (556) have been classified. Remaining PWS are testing, waiting on data, conducting additional testing, or have new supply intakes. **NOTE:** current numbers have decreased due to systems becoming Inactive and being removed from inventory. We also have 8CWS and 1 NCNT orphan/unresponsive systems
2.2.7	**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 and PN requirements. **Report the number of sample site plans reviewed if possible, and discuss any major TCR implementation issues or problems.**	Semi-annual self-assessmen t	No implementation issues or problems. Sample site plans are reviewed for need of modifications when a sanitary survey is performed. Any modifications are reviewed and approved by district offices. Failure to submit or failure to follow the plan are reported to central office for possible issuance of a violation.
2.2.8	**Phase II and V Rule** for nitrates and nitrites: Implement the entire rule for all system types.	Semi-annual self-assessmen	On-going.

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	Implementation includes: enforcing initial and follow up monitoring, making compliance determinations, and following up on violations	t	
2.2.9	**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.		
2.2.10	**Lead and Copper Rule (LCR)** including the **Minor Revisions** 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. Report action level exceedances and milestone information to SDWIS.		On-going. Final EPA Primacy granted 9/23/03.
2.2.11	**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-assessmen t	On-going. Primacy application submitted to EPA January 2003. Arsenic primacy awaiting adoption of revised PWWS regulations by 2004 legislative session. (Needed to have authority for revised MCL)
2.2.12	**PN Rule**: Include public notification requirements in compliance assistance and enforcement actions that are taken on MCL, treatment technique, and M/R violations following all aspects of **Revised PN Rule effective May 2002.**		EPA primacy for PN granted 9/30/03
2.2.13	Revise the **State Compliance Strategy** to reflect	As needed;	

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	changes in the State and Federal regulations, including revised Penalty Authorities, any new or revised State MCLs, 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, Radionuclides, Phase 2 and 5, SWTR, Lead Ban, and LCR violations, the CCR rule, IESWTR and DDBP rule, LCRMR, Arsenic, FBRR, LT1, and other new rules when available. The charts should trace the State's response from identification of a violation through the State's most formal enforcement tools to final compliance. §142.11	Semi-annual self assessment	Ongoing initiate as rules change.
2.2.14	Screen data submitted by public water systems for evidence of data falsification, and take follow-up enforcement action as appropriate. **If possible, report on follow-up enforcement actions taken and status.**	Semi-annual self assessment	On-going. No falsification of data detected during this reporting period.
2.2.15	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 **If possible, report on inspections and enforcement actions taken to enforce Lead Ban**		On-going. Local building codes include plumbing code requirements ban use of lead solders.
2.2.16	Maintain records of tests, measurements, analyses, decisions, and determinations performed on each PWS to determine compliance with application drinking water regulations; sanitary surveys, enforcement actions, vulnerability determinations, Public Notice, etc.; make records available to the Regional Administrator upon request. §142.14	As requested	On-going. Information put into SDWIS database.

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2.2.17	**Consumer Confidence Report:** Report on implementation of CCR Rule (§142.15, §142.16(f)) States with Primacy for the CCR rule must report violations and enforcement actions directly to SDWIS by 11/15. States without Primacy: Report in August CWSs that sent out CCRs and those that did not in an easy to read format, EPA will generate violations for SDWIS. Report similar data for the certifications.	Report to SDWIS by Nov. 15th	Reports provided to EPA as required. On-going. CCR report provided to EPA 8-03.
2.2.18	**Interim Enhanced Surface Water Treatment Rule (IESWTR) and Stage 1 Disinfection By-Products (DBP)**: Implement rules for all systems. Continue to carry out all activities of the rules. Systems less than 10,000 people and all ground water systems to be notified of their requirements prior to January 2004.	Semi-annual self assessment	Primacy application submitted to EPA in April 2003. Has been approved. OEHS District Offices provided instructions, when requested, on conducting profiling to water systems.
2.2.18a	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 each February for prior year's data for every surface water or GUDI water system serving at least 10,000 people.	February 28, 2003 for calendar year 2002 data; by February 28, 2004 for calendar year 2003 data; and by February 28, 2005 for calendar year 2004 data.	On-going.
2.2.19	Continue work on the activities spelled out in the mutually agreed upon Implementation Agreement for **LT1.** For small system (<10,000) compliance with profiling, report # and % of	Report by 11/15/03. Following report due	Report will be submitted November 2003 (actually submitted December 9, 2000)

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	systems that did not comply.	05/15/04.	
2.2.20	Continue to implement **Radionuclides Rule** including updating vulnerability assessments for beta photon and particle emitters.	Semi-annual self assessment	Monitoring schedules now include radionuclide monitoring/grandfather requirements. No known betaphoton sources in West Virginia.
2.2.21	Continue to implement **Arsenic Rule** including the new source/system IOC, VOC, SOC monitoring beginning 1/22/2004.		Report will be submitted when due (January 2004)**.**
2.2.23	Consider this a place holder for the Office of Enforcement and Compliance (OECA) reporting measures. [As far as we know, there are no additional reporting requirements for the States. OECA primarily looks at SNCs, SNCs which have returned to compliance, and those SNCs which are exceptions. OECA Priorities include implementation and enforcement of microbial rules and Federal enforcement of new rules, such as the CCR.]		
2.3 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 Region III's Binders, mailed to each State as the Implementation Guidances become final (these contain 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**.			
2.3.1	**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, December 1, 1999, October 23, 2002 and October 29, 2002 in the Federal Register. §142.12	Withing 2 years of promulgation	State PWWS Rules adopted Spring 2002 providing authority. Office of Laboratory Services has responsibility for implementation.
2.3.2	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 Agency. §142.12	Report changes or potential changes in semi-annual self-assessment.	On-going. No changes to State organization since last report. New, up-dated rules being prepared for 2004 legislative session.

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2.3.3	Continue to implement activities under the **Lead and Copper Rule (LCR) Minor Revisions** Revise the State's implementation plan for the Lead and Copper rule, as necessary. §142.12 and §142.16(d)	Make revisions as needed.	Rules adopted Spring 2002. Extension Agreement: Dec. 31, 2002 Primacy application submitted March '03. EPA granted primacy 9/30/03
2.3.4	Prepare for and adopt **Arsenic Rule** promulgated 1/22/01, and as clarified on 3/25/03. Submit revised AG statement indicating you can implement the MCL as 0.010 mg/L. §142.12 and §142.16(j)	AG Statement due as soon as possible.	Rules adopted Spring 2002. Primacy application submitted January 2003. Final primacy on hold until state has revised PWWS regulations adopted by 2004 legislative session to provide authority for new MCL.
2.3.5	Prepare for and adopt **LT1** Submit Primacy Revision Application or Extension Request to EPA by January 14, 2004. §142.12 and §142.16	Within 2 years of promulgation	Projected date of rule adoption: July 1, 2004. . Letter of Agreement for Implementation currently being reviewed. Primacy application submitted to EPA Dec. 03
2.3.6	Prepare for and Adopt **Radon Rule** Submit Primacy Revision Request or request extension in accordance with final rule promulgation. Submit Radon Rule MMM Letter of Intent, [90 days from final rule promulgation] §142.12	Estimated as Late 2003	Final rules not promulgated.
2.3.7	Prepare for **new regulations** to be promulgated in 2003 and 2004 with State rule adoption due 2 years later: LT2/Stage 2 DBP, MTBE SMCL. §142.12 and §142.16	Within 2 years of promulgation	On-going. FBRR adopted Spring 2002. EPA primacy granted. .
2.4 Surveillance and Technical Assistance			
2.4.1	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 2003 and	Semi-annual self-assessmen t	Deficiencies observed during inspections are described in survey reports and systems' responses to deficiencies are tracked with follow-up contact to systems for assurance of implementation plans. Estimated No. Sanitary Surveys (Class 1) to be

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	2004 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		Performed: **Class 1** CWS (C) 166 128 NTNCWS (P) 5 7 TNCWS (N) 4 12 175 147 **EPA Year 2003** **EPA Year 2004** No. Sanitary Surveys (Class 1) Performed Year-to-Date: **Class 1** CWS (C) 186 NTNCWS (P) 23 TNCWS (N) 37 246 **EPA Year 2003**
2.4.2	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-assessment	From October 1, 2002 - September 30, 2003: 341 water project plans reviewed 305 Permits to Construct issued
2.4.3	Maintain the capability to respond to emergency circumstances and to ensure provision of potable drinking water under emergency circumstances. Assist water systems with vulnerability assessments and new security concerns. Please report on any ongoing emergency issues in self-assessment. §142.10		18 technical representatives have received emergency response training and will receive additional in-depth training. Approximately 10 tech reps responded to winter ice storm affecting numerous water systems.

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2.4.4	Maintain documentation for and implement a Quality Management System which includes an adequate laboratory certification program. Update the State Quality Management Plan for the PWSS Program. The State **PWSS Quality Management Plan (QMP)** documents the Standard Operating Procedures (SOP) and QA/QC 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. This plan is mandatory for all PWSS grant recipients and must be updated annually or as needed. Submit additional requested documentation for conditional approved plans to make QMPs approvable. 40 C.F.R. §30.54 and 31.45 and EPA Guidance–EPA QA/R-2	Report on status of addressing EPA's QA recommenda-tions. **All conditions should be addressed by October 31, 2003.**	Updating on-going. Updated QA/QC documents submitted to EPA July 2002. Awaiting EPA approval. Office of Laboratory Services implementing recommended QA/QC for laboratory issues. These were addressed prior to October 31, 2003.
2.4.5	Develop, implement and update documentation for **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. These plans must be updated as needed. 40 CFR §§30.54 and 31.45, EPA Guidance EPA QA/R-5.	Update annually	State program staff do not collect samples in the implementation of the PWSS program. QA/QC document (which includes QAPP) submitted to EPA July 2002. Awaiting EPA approval.

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	Review QAPPs of contractors.		
2.4.6	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. **State Lab should complete PT sample studies and repeating of any analysis that were unacceptable in make-up studies.** §142.10(b)(3) & (4) To the extent possible, place listing of labs on website.		On-going. Conducted by Office of Laboratory Services.
2.4.7	**Unregulated Contaminant Monitoring Rule (UCMR)** - Carry out responsibilities under the mutually agreed upon Partnership Agreement (PA). Specifically those activities occurring in FY2003 & 2004 - 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 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. - Review monitoring data reported to SDWARS/UCMR. - Work with Community water systems to include UCMR data in CCRs	Report in semi-annual self assessment. Treatment plant lat/long must be reported to SDWIS prior to UCMR data being reported to NCOD.	CWS lat/long data project is 100% complete. Non-community lat/long data is available for ≈ 100% of systems in GIS database. Information currently being transferred to SDWIS as it is checked for accuracy. On-going assistance provided to affected water systems and EPA.

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2.4.8 Training			
2.4.8.1	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 has been utilized through WVRWA via contract through Sept. 2003. WVRWA has provided training classes for operator continuing education hours. 260 training hours have been completed for this reporting period.
2.4.8.2	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 III will assist wherever possible.		Grant to the WV Rural Water Assoc. to provide oversight on new and current regulations and water treatment technologies. Staff also sent to EPA, Rural Water, AWWA and other training opportunities.

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2.5	**Program Management**		
2.5.1	Prepare preliminary FY 2004 and FY 2005 grant application(s) which addresses all applicable required grant elements, and submit all required grant forms and supporting documentation. 40 C.F.R. Part 31 & 35	July 1, 2003 (and July 1, 2004 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.)	FY 04 grant request submitted by July 1, 2003. Final grant application submitted August, 2003.
2.5.2	Prepare and submit a final FY 2004 and FY 2005 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 & 35. Consider two-year applications.	August 1, 2003 (and August 1, 2004 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.)	Final FY 04 grant request completed August 1, 2003.
2.5.3	Prepare and submit a semi-annual self assessment which reports State progress in meeting State	May 15th and November 15th	On-going.

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	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. It is expected that this document will also serve as a reporting tool. 40 C.F.R. §31.40 and §142.15		Reports submitted as required.
2.5.4	Hiring status: include current organization chart, listing of vacancies associated with funding source (PWSS, SRF or state) and a status of filling each vacancy.	Semi-annual self assessments and as requested	See attached organizational chart
2.5.5	All changes to the approved workplan must be discussed with the EPA State Program Manager prior to making the change in order to determine if this is a *significant program change* requiring an amendment or other written documentation for the grant award. 40 CFR Part 31 & 35	As needed	Changes will be presented to EPA program manager as necessary. No changes made during FY03
2.5.6	Provide a Final Financial Status Report documenting FY 2003 and FY 2004 expenditures within 90 days of end of budget period. Program staff are strongly encouraged to work with state grants administrative staff to ensure that this occurs in a timely manner since it can effect carryover applications and awards. Report on steps taken to ensure this occurs. If State elects to apply for a two year budget and project period, FY 2004 FSR will be an interim	December 31, 2003 for FY 2003 expenditures; December 31, 2004 for FY 2004 expenditures. The FY 2004 FSR will be an interim FSR if	FSRs submitted to EPA.

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	submittal. 40 C.F.R. Part 31	State is on a two year budget and project period.	
2.5.7	Maintain records as per §142.14		Records maintained as required.
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 the PWSS Program grant workplan. See additional National and Regional Guidance for more details on DWSRF applications/workplans.*** ***The activities under Sections 3.0 General, 3.1 Capacity Development and 3.2 Operator Certification are required to receive the entire DWSRF Program Allocation. The activities under Section 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.***		
3.0	**General Provisions** Prepare a plan that identifies the intended uses of the amounts available to the DWSRF Program annually. SDWA 1452(b)(1)	Annual	The DWSRF Intended Use Plan (IUP) for SFY 03 was submitted to EPA December 02. IUP identifies uses and quantities of the construction monies as well as set- asides.
3.0.1	Develop and publish a list of prioritized projects in the State that are eligible for funding. The State should develop an overall priority list, as well as a list of projects to be funded in the coming year. SDWA 1452(b)(3)(B) and page 9-11 of the February 28, 1997 final DWSRF Guidance		As part of the IUP for SFY 03 (submitted 12-03), a list of projects was evaluated and prioritized based on public health, regulatory compliance and affordability.

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3.0.2	Review all Significant Non-compliers and list of chronic non-compliers before providing a loan. SDWA 1452(a)(3)(C) **Report, <u>if possible</u> on status of loans provided or will be provided.**	On-Going	Significant Non-Compliers and Chronic Non-Compliers are listed through the Capacity Development Program. Other reviews include by the Technical Committee of the Infrastructure &Jobs Development Council during review of proposed projects, as well as by the OEHS district engineers and staff from the regulatory section during the review of projects for the DWSRF priority list submitted in the IUP.
3.0.3	Prepare and submit a report to U.S. EPA every 2 years on the State's activities in administering the DWSRF Program, including the findings of the most recent annual audits of the fund conducted by the State. SDWA 1452(g)(4), and page 45 of the February 28, 1997 final DWSRF Guidelines	Every 2 years	An annual report for the DWSRF Program was submitted to EPA in November 2002.
3.0.4	**The GPRA Measure is:** # 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.	N/A	The EPA SRF Team reports on this. No additional reporting burden for the state. The measure is included here FYI
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 had 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 would have been 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 20% of its FY'03 DWSRF allotment and in each subsequent year. 1452(a)(1)(G)(i) and 1420 (c), and page 16 of the February 28, 1997 DWSRF Guidelines.**			
3.1.0	**Capacity Development Authority <u>(New Systems)</u>** SDWA Section 1420 Legal authority must be effective by October 1, 1999 to ensure that new systems (CWSs and NTNCWSs) have technical,		

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	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 withholding occurs at the time of the DWSRF award for those FY funds.		
3.1.0.1	Annual Review and Reporting on New System Demonstration of TMF: **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 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 semi-annual progress report should include: • Number and list of approved new CWSs and NTNCWSs • Compliance status of new CWSs and NTNCWSs that commenced operation after October 1, 1999 See PWSS Guidance, Appendix D for a sample reporting format.	Include with a given year's capitalization grant application, in the semi-annual self assessment or in an entirely separate submittal. Semi-annual self assessments	New systems are required to complete form EW-100, "Addendum Capacity Development Questionnaire." Upon review of the completed questionnaire, it is determined if the system has adequate capacity and the Permit to Construct is issued or denied. No new systems have applied for a Permit to Construct during FY2003.
3.1.1	**Capacity Development Strategy <u>(Existing Systems)</u>** 1452(a)(1)(G)(i) and 1420 (c), and page 16 of the February 28, 1997 DWSRF Guidelines. **Background Notes:** The State had 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 following fiscal years, a state must document that it is implementing its strategy to avoid withholding of 20% of its DWSRF allotment in FY'03 and subsequent years.		
3.1.1.1	Annual Review and Reporting for <u>existing system</u> implementation: • **Each year, as a stand-alone submittal; as part of the semi-annual self assessment; or as**	Include with a given year's capitalization grant	Annual Report submitted to EPA in November 2002. The Report documented implementation of the strategy.

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	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.	application, in the semi-annual self assessment or in an entirely separate submittal.	
3.1.2 Other Annual Review and Ongoing Reporting Requirements:			
3.1.2.1	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. Failure to submit the list could result in the withholding of 20% of the state's DWSRF. (This activity repeats every three years) SDWA 1420(b)	Due by July 15, 2003.	Completed June 15, 2000. Report submitted June 2003..
3.1.2.2	The State 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.	Next Report is Due 09/30/2005.	The "Report to the Governor" was completed and submitted by the September 30, 2002 deadline.

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3.2	**Operator Certification Programs**		
3.2.1	To avoid a 20% SRF withhold, States must continue to implement Programs that meet the baseline requirements of the Guidelines and provide Annual Program Reports as per EPA Guidance memo dated 10/15/2001.	Reports are due June 30th.	Program approved by EPA on 2-20-02. Ongoing. Monthly meetings to review & evaluate 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. Currently developing new Class IV PWS operator exam for review by WV Dept of Education for validation. 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. Working with other agencies to develop alternative wetlands training Trained staff in use of computer-grading system. Prepare and distribute every 2-3 months a Division newsletter called "Drips & Drops."

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3.2.2	**Expense Reimbursement Grants** Apply for additional allotments if not part of original application for these funds. States must report on these activities.	Two years from the date of initial OpCert Program approval - 02/20/02	Grant request approve by EPA September 2003.
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 and relevant activities underway. Include copies of contract agreements, MOUs, etc. with other agencies and contractors as per DWSRF Grant Condition. Discuss any significant barriers to implementation with EPA as soon as possible. **The GPRA Goal is**: # and % of community water systems (and population served) that will be implementing programs to protect their source water. **Report** this information using the Source Water Assessment and Protection Reporting matrix (Attachment E). **Report annually** for CWS/ NTNCWS/ TNCWS. SDWA 1453(a)(3) & GPRA	Semi-annual self-assessments, (or other mutually agreed upon dates, such as alternate DWSRF setaside reporting dates)	1) WV DHHR issued 3 SWAP contracts for 54 community surface systems - 100% completed in March 2003. Susceptibility Reports – 54 completed and mailed by June 2003. 2) WV DHHR issued 2 contracts for 28 community groundwater systems completed in February 2003. Susceptibility Reports. Project completed April 2003. 3) Two additional contracts for 86 small community (less than 250 pop) groundwater assessments let in August '03 Expected completion of contracts is to be December 03 with reports completed by February /04 **GPRA Goal:** 142 systems for 26%
3.3.1	Optional: Develop and submit a State source water quality protection partnership program. Evaluate local petitions. SDWA 1454(a)(1)	Semi-annual self-assessments	West Virginia will evaluate the appropriateness of the local petitions in the future.

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3.3.2	Optional: Develop and submit an application for State ground water protection program assistance. SDWA 1429(c)(1)		West Virginia will evaluate the appropriateness of the Ground Water Protection Program assistance in the future.
3.3.3	Optional: Adopt interim alternative monitoring requirements, as appropriate, for PWSs with a completed source water assessment. **Meet with EPA to discuss approval needed for implementation. Start monitoring and give specifics on your review.** SDWA 1418(a)(1)		Not contemplated at this time.
4.	**Recommended Activities (These are activities that do not affect PWSS Primacy or the receipt of Drinking Water State Revolving Loan Funds. However many could be funded under either program.)**		
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.	Quarterly to SDWIS	On-going.

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	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. See SDWIS reporting Guidance		
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. Will consider informal enforcement action codes.
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 program for	Quarterly to SDWIS	Ongoing: SWAP contractors acquired Lat / Long data for surface water and ground water systems' intakes and plant locations. Data for all systems' source and plant locations has been entered into SDWIS. As additional information collected for pumping stations, storage tanks and other ancillary facilities, it is entered into SDWIS.

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	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 Connection and Backflow training / inspector / tester course. Training on-going.
4.4	Interact with other State programs, 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	Wellhead Protection Program within PWSS Program. Routinely coordinate with other stakeholders (i.e., Public Service Commission, Division of Environmental Protection), and others to enhance program activities.
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	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 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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	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. Adopt the Watershed approach. Work with State water quality standard staff to 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). Be sure upstream dischargers are aware of downstream drinking water intakes. 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. (Participation in Partnership for Safe Water and/or Area Wide Optimization Program)		
4.7	Perform public education responsibilities, such as responding to press inquiries, educating the general public, and conducting outreach.		
4.8	Obtain Internet access to improve communications with other agencies, and outreach to the public. Develop computer communications with field offices.		Currently have Internet access.

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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, 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.		Capacity Development assessments encourage systems to control water loss through leak and/or inadequate metering.
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	Semi-annual self-assessments	On-going. Any restrictions must be done in accordance with Public Service Commission rules and regulations. Emergency drought provisions in State Emergency Plan that is invoked when Governor declares a state emergency.

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	with outreach efforts on water conservation.		
4.12	Develop Emergency Preparedness and Response Plans at the State and water system level. Develop training, factsheets; conduct workshops and perform vulnerability assessments.		Statewide plans being finalized for applicable community water supplies. Training, distribution of factsheets, and assistance in performing vulnerability assessments are scheduled for 2003 and 2004 under provisions of EPA's S&T and STAG grants.
5	**Additional State Activities funded with PWSS Grant monies: 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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