

# NDWAC UIC/ Source Water Program Integration Working Group Meeting

**March 25-26, 1999**  
**Executive Summary**

## I. BACKGROUND

The second meeting of the National Drinking Water Advisory Council (NDWAC) Underground Injection Control (UIC)/ Source Water Protection Program Integration was held on March 25-26, 1999 in Washington, D.C. Twenty-one of the 27 members participated. Members Thomas Crawford, John Gennaro, Kathryn Hohmann, Gary Jackson, Jim Carlson, and Andrew Bowen were unable to attend. Richard Deuerling represented Mike Houts.

## II. MEETING SUMMARY

The meeting began with an update on the current status of Source Water Assessment Programs. Discussion focused on implementation of Source Water protection (Government Performance and Results Act measures). The working group discussed their role in the source water protection arena and suggested continuing discussion on measuring protection in future meetings.

The group then reviewed topics from the first meeting relating to the proposed *Revisions to the Underground Injection Control Regulations for Class V Injection Wells* for large capacity cesspools, motor vehicle waste disposal wells, and certain industrial waste disposal wells (63 FR 40586). The first issue discussed concerned allowing certain motor vehicle wells to convert to another type of well. The group suggested that a well inside a motor vehicle facility could be reclassified given certain conditions and requirements.

The group then discussed the implementation timeline for the regulation. The group discussed a more detailed version of the phased-in approach suggested during the first meeting. This approach, which the group recommended, would implement the rule according to a phased-in structure where States submit a plan for first focusing rule requirements in source water protection areas for ground water based community and non-transient water systems and adding other priority areas over time.

Further, the group discussed the timeline for implementation if a State has not completed the source water assessments by May 2003. The group discussed whether requiring statewide implementation was appropriate. They suggested applying the rule statewide by January 1, 2004 or 42 months after State source water assessment program approval, whichever is earlier.

The first issue on Friday was classification of stormwater wells at industrial sites. A representative from the Office of Wastewater Management (OWM) presented an overview of the National Pollutant Discharge Elimination System (NPDES). The group discussed the applicability of NPDES to Class V wells and suggested using a checklist similar to the No-Exposure checklist to identify stormwater wells at industrial sites, and thus exempt them from rule. The group encouraged EPA to increase OGWDW and OWM coordination on stormwater management issues.

Next, background on the "industrial well" category, and what types of facilities are included, was presented. The group discussed whether the proposed regulation should require industrial wells in SWPAs to meet MCLs at the point of injection, as well as the geographic coverage of the rule affecting industrial wells. The group suggested phasing in the rule in a manner similar to the approach suggested

for motor vehicle wells. In addition, whether a waiver option should be provided was discussed. The report submitted by the National Funeral Directors' Association was also discussed.

In addition to the issues covered above, the group suggested that: (1) time to comply with the regulation be extended from 90 days to one year (with a possible extension); (2) pre-closure notification and inventory requirements proposed for Direct Implementation States be extended to cover Primacy States; (3) pretreatment (such as that provided by a septic system) be considered as prior to the point of injection; (4) guidance be drafted to aid in implementation of the proposed rule; and, (5) funding be increased to the UIC program.

The group's suggestions will be presented to the full NDWAC for its consideration in May.