

# The Source Monitoring Waiver Process

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To protect public health, state drinking water rules require water systems to monitor their water sources for potential contaminants. The Department of Health Office of Drinking Water (ODW) developed an approach to help water systems cope with expanding and expensive monitoring requirements in 1994. The rules allow ODW to adjust the requirements based on how vulnerable a water system source is to contamination. ODW uses monitoring waivers to eliminate unnecessary testing while fully protecting human health.

## The Susceptibility Assessment Survey Form

All systems must complete a Susceptibility Assessment Survey Form for each source. The form is used to catalog key susceptibility factors for that water source. As such, it is the building block of the Wellhead Protection Program as well as the Waiver Program.

ODW uses the following information on each source to determine an overall susceptibility rating:

- Well logs, or other indicators of aquifer characteristics
- Depth to open interval
- Construction date and description
- Monitoring records (nitrates, bacteria, volatile organic compounds and synthetic organic compounds)
- A specific, accurate location of the source
- Water level information
- Estimate of wellhead elevation
- A general evaluation of land-use surrounding the wellhead
- Size of the water system

## Determining vulnerability

Vulnerability is a water source's potential for contamination from activities that may occur in the area from which the source draws its water. Two factors influence vulnerability:

### 1. Physical susceptibility to contaminant infiltration

Physical susceptibility is determined by examining conditions that affect the movement of contaminants from the land surface into a water supply. This includes the depth of the well, its construction, the geology of the area, the pumping rate, the source(s) of groundwater recharge, and the aquifer material.

### 2. Contaminant Exposure

The risk of contaminant exposure is based on what contaminants, if any, were used in the water supply area.



It can be difficult to predict groundwater pollution from surface exposure accurately because each contaminant type may behave differently in the environment. Therefore, physical susceptibility is the key factor used to determine vulnerability. If physical susceptibility data is incomplete, or contaminant use is highly unlikely, ODW bases the vulnerability assessment on risk of exposure to contaminants.

## **ODW's Program**

For the Waiver Program, ODW has conducted groundwater testing throughout the state to get information on occurrence of synthetic organic compounds (SOCs). In areas where SOCs were detected, we require systems to monitor susceptible sources for those compounds. We reduce or waive sampling in areas with little evidence that contamination could occur. We also consider information from this groundwater study when evaluating surface water sources in these areas.

The waiver approach allows some systems to protect public health without having to conduct extensive contaminant inventories or monitoring. ODW offers two types of waivers:

### **1. State Waiver**

Waivers are issued when our knowledge of state exposure to contaminants indicates a low risk for most if not all water systems. These waivers are automatic and have no fee.

### **2. Source Specific Waiver**

Source specific waivers consider site-specific information on vulnerability. ODW provides waiver packets to applicable systems. These systems can elect to purchase a waiver or complete all of the source monitoring requirements. Fees for the waivers are established in state law.

Participation in the Waiver Program is voluntary. If a system chooses not to participate, the system must complete required sampling.

## **For more information:**

Visit ODW online at <http://www.doh.wa.gov/ehp/dw> or call the Source Monitoring Program at the:

- Southwest Regional Office (360) 236-3046
- Northwest Regional Office (253) 395-6777
- Eastern Regional Office (509) 456-2475

