

The Source Monitoring Waiver Process

August 2011

DOH 331-359
(Updated)

The Office of Drinking Water's Group A rule for public water systems, chapter 246-290 WAC, requires water systems to monitor their water sources for potential contaminants. The monitoring waiver process allows us to adjust the requirements based on how vulnerable a water system source is to contamination.

The Susceptibility Assessment Survey Form

All water systems must complete a Susceptibility Assessment Survey Form for each source. The form catalogs key susceptibility factors for that water source. Information from the form is the building block of the Waiver Program, as well as the Wellhead Protection Program. We use 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, coliform bacteria, volatile organic compounds, and synthetic organic compounds)
- Location of the source
- Water level information
- Wellhead elevation
- An evaluation of land-use surrounding the wellhead
- Size of the water system

Determining vulnerability

We verify source vulnerability to identify potential 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:** We determine physical susceptibility 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:** We base the risk of contaminant exposure 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 act differently in the environment. Therefore, we use physical susceptibility to determine vulnerability. If physical susceptibility data is incomplete, or contaminant use is highly unlikely, we base the vulnerability assessment on risk of exposure to contaminants.

Waiver program

For the Waiver Program, we conducted groundwater testing throughout the state to get information on occurrence of synthetic organic compounds. In areas where synthetic organic compounds were detected, we require water 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 water systems to protect public health without having to conduct extensive contaminant inventories or monitoring. Participation in the Waiver Program is voluntary. If a water system chooses not to participate, the water system must complete required sampling. We offer two types of waivers:

1. **State waiver:** We issue state waivers automatically when our knowledge of state exposure to contaminants indicates a low risk for most if not all water systems.
2. **Source specific waiver:** Source specific waivers consider site-specific information on vulnerability. We provide waiver packets to applicable water systems.

For more information

Visit our website at <http://www.doh.wa.gov/ehp/dw> or call our regional offices at:

Eastern Region, Spokane Valley (509)329-2100

Northwest Region, Kent (253) 395-6750

Southwest Region, Tumwater (360) 236-3030

