

Small Systems Working Group

EXECUTIVE SUMMARY

APRIL 28-29, 1997
WASHINGTON PLAZA
WASHINGTON, DC

Bob Perciasepe, Assistant Administrator for Water, opened the meeting and spoke about the importance of an integrated view of SDWA implementation for small systems. He emphasized the importance of considering how the various elements can be fit together to address small system issues.

The NDWAC Small Systems Working Group reached three major decisions at its April 28-29, 1997 meeting:

1. By consensus, the working group agreed to recommend to NDWAC that EPA issue guidance for States on assessing technical, financial, and managerial capacity of water systems seeking SRF assistance. The working group will recommend that the guidance require States, as part of their intended use plan, to:
 1. a) self-certify that they will assess the technical, financial, and managerial capacity of applicants relative to National Primary Drinking Water Regulations (both existing and those likely to be in effect in the foreseeable future) and; b) to briefly describe the procedures to be used in assessing capacity.
 2. a) self-certify that, for systems in significant non-compliance, the State will determine that the SRF assistance will help to ensure compliance, and; b) to briefly describe how the State will assess the appropriateness of such plans.
 3. a) self-certify that, for systems lacking capacity, the State will require implementation of an appropriate, comprehensive long-term capacity development plan, and; b) to briefly describe how the State will assess the appropriateness of such plans.
2. The working group reviewed and reaffirmed its consensus decisions to recommend to the full NDWAC that EPA produce six specific work products related to capacity development and affordability; and to recommend specific first draft language for these products. The group agreed that the preliminary working drafts of these documents continued in the binders they received in advance of the meeting were reflective of working group input to date. The group agreed that these drafts should continue to be developed and refined. The six specific products are:
 1. Guidance for States on Ensuring the Technical, Financial, and Managerial Capacity of New Community Water Systems and New Non-Transient, Non-Community Water Systems.
 2. Guidance for States on Preparation of Capacity Development Strategies (What States need to do to avoid the SRF withholding).
 3. Information for States on options they can consider in developing their Capacity Development Strategies.
 4. Information for States on options for assessing the technical, financial, and managerial capacity of systems seeking SRF assistance.
 5. Information for the public to better enable them to participate with States in the development of State Capacity Development Strategies.
 6. Information for States to assist them in developing affordability criteria.
3. The working group decided against taking on the issue of national level affordability criteria for use in listing affordable technology for small systems under Section 1412(b)(4)(E) of the

amended SDWA. The group could not reach consensus on this decision, and it was decided by a 9-5 vote with several abstentions. A number of working group members expressed the sentiment that the issue should be addressed by a group of similar composition but that the existing group could not take on any additional issues.

In addition to these decisions, the working group deliberated about definitions of technical, financial, and managerial capacity. Based on the discussion which occurred on the issue paper on definitions, the contractors will revise the proposed definitions and incorporate them as appropriate into the other specific work products.

Members Present for the Meeting

All members were present for the meeting except Yvette dePeiza, who was represented by George Zoto, and Teresa Rissmiller who was ill. Melinda Cross sent regrets that she could not actively participate in the group's work and asked to be moved to the status of an interested party. Rita Wayco of USEPA Region 4 joined the group to fill the vacant slot.

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