



Safe Drinking Water Information System (SDWIS)

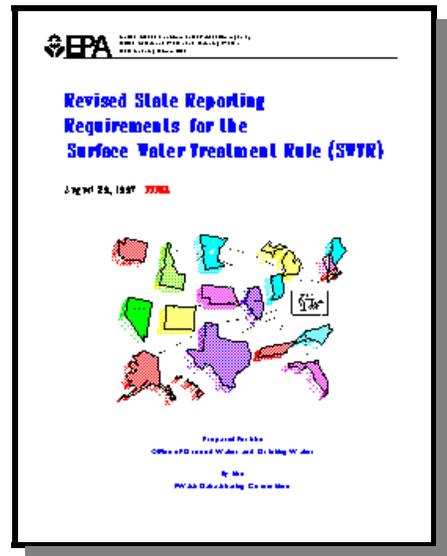
FACT SHEET

“Revisions to the Surface Water Treatment Rule (SWTR) Reporting Requirements”

April, 1998

The revisions as described in this fact sheet are the result of a review of the SDWIS Surface Water Treatment Rule (SWTR) data needs and the current reporting requirements conducted by the Data Sharing Committee and others. The changes to the current SWTR reporting requirements are presented below in general terms. The technical reporting guidance is being developed and will be available by Spring of 1998. For a more thorough analysis and discussion of these revisions and the reasons for making these changes see the Data Sharing Committee's report: *Revised Reporting Requirements for the Surface Water Treatment Rule (SWTR)*, August 29, 1997.

Following the construct developed during the review of inventory data, the data attributes were divided into two main groups: Core Data Set attributes, and Data Sharing Goal attributes. Core Data Set attributes represent the new interpretation of reporting requirements contained in 40 CFR §142.15. Grant funds will be withheld for failure to report. These attributes were judged as the most essential to describe the drinking water program at the national level and to support U.S. EPA's most basic program responsibilities. Only Core Data Set attributes are discussed in this fact sheet. The DSC did not identify any data specifically as Data Sharing Goals during their analysis of the SWTR.



The following data will no longer be in the Core Data Set for FY 1998 and beyond.

Filtration Requirement Determination Records¹

Filtration Requirement Determination Records were initially required to be reported for any system that was required to filter and that did not have filtration installed before 12/91. These records were also required to be reported for systems that were successfully avoiding filtration but subsequently were triggered into the filtration requirement and also for ground water systems that were determined to be under the direct influence of surface water and that were required to filter.

¹ Filtration Requirement Determination Records are reported as Data Transfer File (DTF) format C3000 elements which are also used to report Variance and Exemption records. Currently three data elements must be reported: C3005 (VE-RECORD-TYPE) with a value of "FR"[stored in SDWIS/FED as MILESTONE_EVENT / TYPE_CODE], C3007 (VE-EFFECTIVE DATE)[stored in SDWIS/FED as MILESTONE_EVENT / ACTUAL_DATE], and C3019 (VE-REASON-CODE)[stored in SDWIS/FED as MILESTONE_EVENT / REASON_CODE].

The main reasons that this reporting requirement is being removed include:

- ▶ The more important information to track are the violations that would occur if the system failed to meet the deadline for installing filtration . With the formalization of the Type 42 violation type (see below) and the expansion of this requirement to include ongoing occurrences of this violation, significant noncompliance with this rule can be tracked. The knowledge that systems that were avoiding filtration are now required to filter are less significant and will be captured when they fail to install filtration on time.
- ▶ It is still required to report treatment codes, including the fact that a source is unfiltered, but required to filter. The reporting of these treatment data provides some, but not all, of the information that the filtration requirement milestone data provides and will allow for the tracking of the filtration status for these systems.
- ▶ The reporting of this information (as C3000 variance and exemption data) is confusing, not well understood, and has resulted in inconsistent and incomplete data in SDWIS/FED.
- ▶ These changes would be consistent with other SDWIS/FED reporting requirements.

*The following requirements have been added to or changed in the Core Data Set:***A new violation type to track systems that fail to meet filtration installation deadlines.²**

The SDWIS Violation Type 42 was already created by EPA to track systems that failed to meet the December 31, 1991 filtration deadline. This change would provide access to these violations by States and would require States to report all systems that fail to meet filtration deadlines.

The main reasons for adding this new violation type include:

- ▶ The tracking of compliance for unfiltered surface water PWSs is a top EPA priority. This information is critical to the success of EPA's efforts and to ensure that all PWSs meet the requirements of the SWTR.
- ▶ This violation type is needed for the proper operation of the newly developed SNC/Exception Tracking Subsystem of SDWIS/FED.
- ▶ It is still timely to add this violation type since roughly half of the systems originally identified as unfiltered have yet to install treatment. In addition, new systems such as those determined to be GWUDI of surface water may incur this violation type.
- ▶ This new violation type will allow for a more accurate analysis of the SWTR which will be important for future regulation development such as the Enhanced SWTR. In particular, analyses of treatment installation impacts and the time-frames needed to comply can be conducted using this information.
- ▶ The EPA is routinely asked to report to Congress, the public, and other stakeholders on the status of unfiltered PWSs. This new violation type will provide a more accessible, less burdensome, and more accurate way to provide the needed information. In addition, this information, like other violation information, will be part of the Envirofacts database and available via the Internet.

² Detailed guidance will be developed for the reporting of these violations. Preliminary thinking is that these violations would be reported by reporting the following DTF records: C1105 with a value of "42", C1107 with the date that the system was to have installed filtration but failed to meet, C1109 with a future projected end date when it is anticipated that filtration will be installed and operational, or, a fictitious future date (e.g., 01/01/9999) is unknown. This end date will be changed to an actual date once the system has returned to compliance and the "compliance achieved" follow-up action is reported.

Violation durations of greater than one month be allowed for treatment technique violations (SDWIS Violation Type 41)³

Currently, all Type 41 violations have a one-month duration. In some cases, the treatment technique failure(s) that constitute the Type 41 violation are the result of a larger problem that requires modification or installation of new treatment technologies. This change in reporting relates to those cases and will allow a State the ability of reporting the Type 41 violation once with an end date that is either a projection of when the treatment is to be installed or a bogus date in the future such as 01/01/9999 (SDWIS/FED requires a date in all date fields; they cannot be filled with blanks).

The main reasons for making this modification include:

- ▶ The ability to maintain violation end dates as future dates will allow States the flexibility of reporting violations in the manner that is best for them, given their compliance situations and their data systems.
- ▶ Reporting and maintaining data in this way would also more accurately represent the violation information in SDWIS/FED.
- ▶ The concept of future end dates is similar to what is being implemented as part of the newly developed SNC/Exception Tracking System.
- ▶ The additional details of the SWTR violations will give a better picture of the length of violations that are occurring to verify the assumptions made in the development of the SWTR. It will also provide more detailed and valuable information for input into the development of the Enhanced SWTR.
- ▶ By knowing the durations of violations of the SWTR, States and EPA can more realistically prioritize compliance and enforcement actions to the types of violations that are more critical and of higher priority.
- ▶ The user would be able to determine situations where violations are truly monthly from those that will take more time to correct. This will especially be important as this information is provided via the Internet as part of the Envirofacts database.

Implementation Schedule

The deletion of the Filtration Requirement Determination Record reporting requirement is effective immediately. Since the other changes that are being made are preferred by many States, the revised reporting will be allowed as soon as SDWIS/FED can be modified to accept the new data, and will be required no later than 18 months following the development and transmittal of the technical guidance. Until these new requirements become effective, the current reporting requirements must, at a minimum, continue to be reported.

³ Currently, when Type 41 violations are reported there is no need to report the C1109 data element since the duration for these violations is set at one month. This change requires the reporting of C1109 with all Type 41 violations. The data value of C1109 is the date that the system is expected to install/modify treatment and achieve compliance, or if unknown, a fictitious future date such as 01/01/9999.