**U.S. EPA CLEAN WATER ACT/SAFE DRINKING WATER ACT INTEGRATION CHECKLIST – STATE VERSION**

# INTRODUCTION

The U.S. Environmental Protection Agency (EPA) has been promoting the integration between Clean Water Act (CWA) and Safe Drinking Water Act (SDWA) Programs for some time now. As highlighted in the [FY16/17 National Water Program Guidance](https://www.epa.gov/sites/production/files/2015-04/documents/2016-2017_nwpg_final.pdf), states are strongly encouraged to take collaborative actions that integrate CWA and SDWA source water protection (SWP) activities to advance public health and environmental protection objectives at the state, interstate and local levels.

The CWA/SDWA Toolkit—*“*[*Opportunities to Protect Drinking Water and Advance Watershed Goals through the Clean Water Act: A Toolkit for State, Interstate, Tribal and Federal Water Program Managers*](http://www.asdwa.org/document/docWindow.cfm?fuseaction=document.viewDocument&documentid=3007&documentFormatId=3779)”—released in November 2014, was the result of a multi-year effort by state and EPA clean water and safe drinking water programs. This Toolkit is designed to enable state and EPA water quality practitioners to better protect drinking water supplies using regulatory and non-regulatory provisions of the CWA and achieve mutual goals—better protected sources of drinking water and improved water quality. While the Toolkit provides numerous examples of activities that can be integrated, EPA Region 5 believed another tool was needed to evaluate the extent to which state programs are currently integrated. As a result, EPA Region 5 has developed this voluntary, draft CWA/SDWA Integration Checklist, which also has been revised and used in Region 3.

# PURPOSE OF THE CWA/SDWA INTEGRATION CHECKLIST

The EPA Region 5 Water Division CWA/SDWA team has developed this draft CWA/SDWA Integration Checklist, which has been modified by Region 3, for consideration for use by states to self-assess CWA/SDWA coordination efforts and to identify opportunities to improve state collaboration.

EPA Regions 3 and 5 also intend to use a regional version of this checklist to identify where to focus efforts within their divisions to improve collaboration and communication, as well as to bridge the gaps between CWA and SDWA programs at the state and regional levels. For example, the checklist may help identify where EPA can share information and influence each other’s programs to better protect water resources. States that intend to use this checklist may want to reach out to their state CWA and SDWA counterparts to discuss the answers to these questions.

Additionally, Attachment A provides a list of reasons why we should integrate our CWA and SDWA activities. Attachment B provides a list of SWP-related information that the EPA regional SWP programs may be able to provide to their respective regional CWA programs, which the state could revise for their own purposes.

# CHECKLIST QUESTIONS

The CWA/SDWA Integration Checklist below is intended to be completed by both the state clean water and drinking water program staff. The information collected can be used by the state to establish a baseline for determining CWA/SDWA integration success and checking progress periodically by conducting regular evaluations. Program staff can also make suggestions about where there are opportunities for improvement of implementation activities at the state level.

The CWA/SDWA Integration Checklist below covers 10 potential program self-assessment areas, which include:

1. Water quality standards (WQS) for drinking water use;

2. Monitor/assess WQS attainment for drinking water use;

3. List impaired waters for drinking water use impairments;

4. TMDL development for drinking water use impairments and in source waters;

5. Integrated watershed planning/implementation;

6. Control nonpoint sources;

7. Control point sources with permits;

8. Enforcement;

9. Special initiatives and continuing planning process; and

10. SWP program.

If the answer to a question is “yes”, a description can be added that describes what integration is already occurring. If the answer is “no,” an explanation can be added that explains what the barriers might be (e.g., other priorities are taking precedence). Further, the description/explanation area can be a place to describe any possible areas of improvement or new integration opportunities.

| **Program AND STATE-specific questions** | **Yes** | **No** | **DESCRIPTION/**  **EXPLANATION:** |
| --- | --- | --- | --- |
| WATER QUALITY STANDARDS FOR DRINKING WATER USE *The purpose of the following questions is to gather information about what water quality standards (WQS) the state has adopted to protect the drinking water (also often called public water supply) use.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Are waterbodies used for drinking water designated as such? If yes, describe the geographic component—that is, what part of the waterbody is designated for the drinking water use (e.g., the watershed, a certain area surrounding the intake, etc.). Please describe and/or cite key documents. | □ | □ |  |
| 1. Are drinking water uses supported by comprehensive numeric or narrative criteria? Please describe and/or cite key documents. | □ | □ |  |
| 1. Which specific numeric criteria exist for drinking water contaminants of concern? Please describe and/or cite key documents. | □ | □ |  |
| 1. If narrative criteria are used, how are they interpreted? Please describe and/or cite key documents. | □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/methodologies/ etc. exist that incorporate SWP for water quality standards? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| MONITOR/ASSESS WQS ATTAINMENT FOR DRINKING WATER USE *The purpose of the following questions is to determine whether the state is monitoring and assessing waterbodies for drinking water use as described in the monitoring strategy and assessment methodology.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Are parameters and/or indicators being monitored for waterbodies designated for the drinking water use? Please describe and/or cite key documents. | □ | □ |  |
| 1. Are the parameters/indicators monitored for drinking water use designations based on sampling locations within proximity to drinking water intakes? Please describe and/or cite key documents. | □ | □ |  |
| 1. What frequency are the parameters monitored and how is the frequency determined? Please describe and/or cite key documents. | □ | □ |  |
| 1. Is the state monitoring ground waters used for drinking water? Please describe and/or cite key documents. | □ | □ |  |
| 1. Are other local, state, or non-governmental entities collecting monitoring data? If yes, please describe what other entities are collecting data, and whether the data are leveraged to make drinking water use impairment decisions. | □ | □ |  |
| 1. Does the state monitoring strategy describe monitoring of drinking water sources, including the above questions? Please describe and/or cite key documents. | □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/methodologies/ etc. exist that incorporate SWP for monitoring or assessing water quality standards? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| LIST IMPAIRED **WATERS** FOR DRINKING WATER USE IMPAIRMENTS *The purpose of the following questions is to determine whether the state is making drinking water use impairment determinations.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Is the state listing drinking water use impairments with associated pollutants and causes/sources of impairments? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the state assessment methodology describe a process for making assessment decisions about drinking water uses? Please describe and/or cite key documents. | □ | □ |  |
| 1. Are assessments of the drinking water use occurring? If yes, please describe at what frequency. | □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/methodologies/ etc. exist that incorporate SWP for listing impaired waters? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| TMDL DEVELOPMENT FOR DRINKING WATER USE IMPAIRMENTS AND IN SOURCE WATERS *The purpose of the following questions is to determine whether and how the drinking water program is involved in the development of TMDLs or other pollution control plans needed to address: (1) drinking water use impairments and (2) other types of impairments in sources of drinking water.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. If a TMDL or another type of pollution control plan is needed to address drinking water use impairments, is the state drinking water program involved in this planning process (e.g., public water systems (PWSs) in the watershed have been notified). Please describe and/or cite key documents. | □ | □ |  |
| 1. If a TMDL or another type of pollution control plan is needed to address another use impairment (e.g., recreation, aquatic life) in a waterbody also used as a drinking water source, is the state drinking water program involved in this planning process (e.g., PWSs in the watershed have been notified). Please describe and/or cite key documents. | □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/methodologies/ etc. exist that incorporate SWP for TMDL development? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| INTEGRATED WATERSHED PLANNING/IMPLEMENTATION *The purpose of the questions below is to determine whether and how source water, ground water, and water quantity considerations are incorporated into integrated watershed planning (or integrated water resource management[[1]](#endnote-2)) initiatives, where they exist.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Where integrated watershed planning processes exist in SWP areas, is the state drinking water program involved (e.g., to incorporate the source water assessment or any SWP plans)?[[2]](#endnote-3) Please describe and/or cite key documents. | □ | □ |  |
| 1. Where integrated watershed planning processes exist in SWP areas, are ground water quality, surface/ground water quantity, water efficiency, and storm water incorporated? Please describe and/or cite key documents. | □ | □ |  |
| 1. Is it a state requirement for watershed-based plans to consider SWP? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the state have watershed planning guidance that recommends prioritizing SWP areas?[[3]](#endnote-4) Please describe and/or cite key documents. | □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/methodologies/ etc. exist that incorporate SWP for integrated watershed planning? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| CONTROL NONPOINT SOURCES *The purpose of the questions below are to determine whether SWP is incorporated into the state CWA Section 319 and Clean Water State Revolving Fund (CWSRF) programs, where appropriate.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Do the state CWA Section 319 program assessment and management plans mention SWP? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the state’s Section 319 grant solicitation process mention SWP? Please describe and/or cite key documents. | □ | □ |  |
| 1. As the state revises their Section 319 management plans, is the source water protection program routinely providing review and comment on the plan? Please describe and/or cite key documents.    1. Has the state recently updated their plan, and does it include SWP? Please describe and/or cite key documents. | □ | □ |  |
| □ | □ |  |
| 1. Is the state drinking water program involved in the review of Section 319 grant applications in SWP areas? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the state prioritize funding for controlling nonpoint sources in source waters through the CWSRF program and intended use plan (IUP)? Please describe and/or cite key documents. | □ | □ |  |
| 1. Do the state’s NPS and SWP programs coordinate with the CWSRF program? Please describe and/or cite key documents. | □ | □ |  |
| 1. Do any state program-specific (Section 319 or CWSRF) checklists/SOPs/methodologies/etc. exist that incorporate SWP for non-point source control? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| CONTROL POINT SOURCES WITH PERMITS *The purpose of the following questions is to determine how SWP can be integrated into and prioritized within the permitting process.* State program contact(s): please list any names here as appropriate | | | |
| 1. Do state permit writers consider downstream impacts on drinking water sources? Please describe and/or cite key documents. | □ | □ |  |
| 1. Are point sources permitted in SWP areas (e.g., injection wells, concentrated animal feeding operations, municipal separate storm sewer systems)? Please describe and/or cite key documents. | □ | □ |  |
| 1. Is the five-year NPDES permit review/renewal process structured such that reviews are prioritized based on proximity to SWP areas? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the state prioritize funding for controlling point sources in source waters through the CWSRF program and IUP? Please describe and/or cite key documents. | □ | □ |  |

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| **Program AND STATE-specific questions** | **Yes** | **No** | **DESCRIPTION/**  **EXPLANATION:** |
| 1. Do any state program-specific (NPDES or CWSRF) checklists/ SOPs/methodologies/etc. exist that incorporate SWP for point source control? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| ENFORCEMENT *The purpose of the questions below is to determine how SWP areas can be prioritized in state enforcement programs.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Does the state enforcement program have a policy or strategy that gives priority to SWP areas? Please describe and/or cite key documents. | □ | □ |  |
| 1. Based on the state’s definition of “waters of the state,” does the state’s surface water team take enforcement/compliance actions for groundwater contamination? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the surface water team have and/or use maps of areas susceptible to source water contamination (e.g., karst topography) in targeting priority areas? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the state consider underground sources of drinking water when approving implementation of green infrastructure practices to ensure that the siting and design of such practices does not contaminate ground water? Please describe and/or cite key documents. | □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/methodologies/ etc. exist that incorporate SWP for enforcement? Please describe and/or cite key documents.    1. If so, have these documents been shared with state SWP programs? Please describe. | □ | □ |  |
| □ | □ |  |
| SPECIAL INITIATIVES AND CONTINUING PLANNING PROCESS[[4]](#endnote-5) *The purpose of the questions below is to determine whether additional opportunities exist to more effectively integrate SWP into CWA and SDWA programs—either through special initiatives, the continuing planning process, or tracking project outcomes.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Does the state’s nutrient reduction strategy address SWP? Please describe and/or cite key documents. | □ | □ |  |

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| **Program AND STATE-specific questions** | **Yes** | **No** | **DESCRIPTION/**  **EXPLANATION:** |
| 1. Does the state’s continuing planning process and water quality management plan address SWP (e.g., see CWA Sections 208 and 303(e) and 40 CFR Part 130)? Please describe and/or cite key documents. | □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/methodologies/ etc. exist that incorporate SWP for other special initiatives or the continuing planning process? Please describe and/or cite key documents. | □ | □ |  |
| SWP PROGRAM[[5]](#endnote-6) *The purpose of the questions below is to document the status of the state SWP program.* State program contact(s): Please list any names here as appropriate. | | | |
| 1. Is the state drinking water program updating source water assessments, working to make sure that protection plans are in place, and tracking implementation, etc.? Please describe and/or cite key documents.    1. Are CWA programs part of the state review of these documents? Please describe. | □ | □ |  |
| □ | □ |  |
| 1. Are there any state-specific funding sources that can be used by programs to fund on-the-ground activities or provide technical assistance in SWP areas? Please describe and/or cite key documents. | □ | □ |  |
| 1. Does the state SWP program designate certain SWP areas as state priorities? Please describe and/or cite key documents.    1. If so, please describe how this information is communicated to state CWA programs. | □ | □ |  |
| □ | □ |  |
| 1. Do any state program-specific checklists/SOPs/ methodologies/etc. exist that document how to conduct SWP-related reviews? Please describe and/or cite key documents.    1. If so, have these documents been shared with state CWA programs? Please describe. | □ | □ |  |
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# ATTACHMENT A: Why we should integrate our CWA and SDWA activities

Incorporating source water protection (SWP) into our Clean Water Act (CWA) programs provides a more holistic, efficient, and economical means to manage water resources; leverages additional funding sources; and allows for increased engagement with stakeholders with a vested interest in water quality improvements. These benefits are explained below:

* HOLISTIC: **Better protect source water for *all* uses; SWP of both surface and ground water drinking water sources provides a more holistic approach to water resource management and includes issues related to both source water *quality* and *quantity*.** For example, surface water impairments could be the result of contaminated ground water, which would not be discovered unless ground water monitoring data that states collect are considered. Ground water impacts should be considered where green infrastructure is promoted to help clean up urban waters. Green infrastructure can have both positive and negative impacts on ground water; green infrastructure can increase the recharge to dwindling ground water supplies, but it is also necessary to make sure that surface water pollution is not redirected to underground sources through infiltration without any natural treatment. Protection of underground sources of drinking water involves careful siting and selection of green infrastructure practices in wellhead protection areas, especially at brownfields/cleanup sites.
* EFFICIENT: **Better bang for the buck: on-the-ground activities can have multiple benefits to CWA and SDWA programs.** For example, voluntary programs and best management practices (BMPs) are effective tools for controlling agricultural and rural nonpoint source pollution that can have significant impacts on surface water quality and vulnerable aquifers used for drinking water.
* ECONOMICAL: **The increasing costs of drinking water treatment may not be sustainable in the long term.** The treatment costs at public water systems (PWSs) to remove anthropogenic contaminants in source waters is increasing in certain areas (e.g., where harmful algal blooms are increasing), which may impact system resiliency, particularly for smaller systems, because PWS customers bear the cost of this additional treatment.
* LEVERAGE: **SDWA and CWA-related funding may be leveraged in SWP areas. (Source:** [**Funding Source Water Protection**](http://water.epa.gov/infrastructure/drinkingwater/sourcewater/protection/funding.cfm)**)**
  + The Clean Water State Revolving Fund (CWSRF) can be a powerful tool to help states fund a variety of protection activities. The CWSRF program can provide assistance to communities, water systems, and other organizations (including land conservation associations) for projects that protect source water and enhance water quality.
  + States can also use Drinking Water State Revolving Fund (DWSRF) set-aside funding to support the development of source water assessments and on-the-ground activities (e.g., agricultural best management practices).
  + Through the CWA Section 319 program, states that have completed Unified Watershed Assessments receive funds to support eligible nonpoint source pollution management activities, which may include best management practices and monitoring in source water protection areas.
  + The national [Source Water Collaborative](http://www.sourcewatercollaborative.org/) (SWC) has supported [SWP pilot projects](http://www.sourcewatercollaborative.org/highlights/source-water-collaborative-announces-2013-pilot-programs-in-pa-wi-and-wy/), including one in Lancaster County, Pennsylvania, in which they provided contractor assistance to plan an agriculture education workshop focusing on conservation best management practices to improve soil health and water quality. Another project in Wisconsin provided contractor assistance to develop communication plans.
* STAKEHOLDERS: **Involving the drinking water community may bring to the table a broader group of stakeholders who are invested in the quality and quantity of their source waters from a public health and economic perspective.**
  + In some cases, PWSs, particularly larger ones, may have resources to become stakeholders in various initiatives. PWSs have a vested interest in the quality of the source water and may be interested in participating in the implementation of Total Maximum Daily Loads (TMDLs), for example. In addition, PWSs collect some ambient water quality monitoring data that they might be willing to share, and the state SWP program may have access to monitoring data that could be useful to track trends/progress.
  + Outreach to connect the public to their drinking water sources can potentially increase the number of people interested in learning about how to help protect water resources. People might be more willing to get involved in protection efforts if they know that the quality and quantity of water available to their children can be impacted by their actions. Therefore, focusing on drinking water may be a good way to connect people to the other important functions of water resources, such as the quality of fish and wildlife habitat.

# ATTACHMENT B: What information can the EPA regional Safe Drinking Water Act Programs provide to the Clean Water Act Programs?

In addition to providing source water protection (SWP)-related comments on state-specific documents, the EPA regional SWP programs may be able to provide the following types of information that could be useful to regional CWA programs to protect source waters:

1. Locations of SWP areas and public water systems (PWSs), although this information is sensitive, so the exact locations are kept “close hold.” However, information about the number of public water systems (PWSs) in a particular location (e.g., by watershed, county) can be aggregated so that it can be made available more broadly. (Source: Safe Drinking Water Information System/Federal version (SDWIS/Fed), which can be accessed by some EPA staff. In addition, aggregated PWS data are available via [MyWATERS Mapper](http://www.epa.gov/waters/enviromapper/), [Nitrogen and Phosphorus Pollution Data Access Tool (NPDAT)](http://www2.epa.gov/nutrient-policy-data/nitrogen-and-phosphorus-pollution-data-access-tool), and [Drinking Water Mapping Application to Protect Source Water (DWMAPS)](http://www.epa.gov/sourcewaterprotection/dwmaps).
2. Information from a PWS source water assessment, which includes a description of the SWP area, an inventory of potential contaminant sources within the SWP area, and a susceptibility analysis. (Sources: Some states post these assessments online or via password-protected websites, and if not, this information could be requested from the state SWP programs.)
3. Information from a PWS’s SWP plan, if one exists. (Source: The state SWP program may have access to SWP plans and may have additional information about a particular SWP area, such as whether there have been special investigations conducted.)
4. PWS health-based SDWA violations. (Source: [Safe Drinking Water Information System (SDWIS)](https://www.epa.gov/waterdata/drinking-water-tools), [Envirofacts](http://www.epa.gov/enviro/facts/sdwis/search.html), [ECHO Drinking Water Dashboard](http://echo.epa.gov/trends/comparative-maps-dashboards/drinking-water-dashboard))
5. Contaminant detects and treatment used. Some states make PWS monitoring data publicly available, which includes detects in finished water, as well as some raw (ambient) water quality data (e.g., total organic carbon). State Annual Compliance Reports list the violations for all water systems for the year. Consumer confidence reports (CCRs) are also prepared by community water systems each year by July 1st and include detects of contaminants and can include other useful information (e.g., the type of treatment used, such as activated carbon for taste and odor issues, which can be related to nitrogen and phosphorus pollution). The type of treatment used by PWSs can also be found in SDWIS/Fed that EPA regional SWP programs can access. Some larger PWSs have websites with treatment and other useful information, too. The EPA and/or state drinking water program also may be able to obtain information. (Sources: PWS websites, SDWIS/Fed, or regional/state drinking water programs.)
6. Proximity of the SWP area to a designated sole source aquifer (SSA), which indicates that the ground water resource is recognized by EPA as sensitive and critical and warrants special attention. (Source: Each region has an SSA coordinator.)
7. Ambient ground water quality data that states and USGS are collecting. (Sources: State SWP programs and USGS websites.)
8. Potential stakeholders, such as any PWSs or other entities mentioned in the source water assessment or SWP plan. (Sources: PWS source water assessments, SWP plans, and PWS websites.)
9. Water systems that substantially implement source water protection activities as defined by the states. SDWIS/Fed includes a source water protection code and date for the states that have submitted this information to SDWIS/State. States also provide this information to the regional source water protection programs when reporting on annual performance measures.

**End Notes**

1. The [*National Water Program 2012 Strategy: Response to Climate Change*](http://water.epa.gov/scitech/climatechange/upload/epa_2012_climate_water_strategy_full_report_final.pdf) “… uses IWRM to describe op­portunities for state, interstate, tribal, and local officials to voluntarily collaborate at watershed or aquifer scales, with support from federal agen­cies, to protect and preserve freshwater resources through mutually beneficial solutions. IWRM calls for intersector planning (e.g., between the energy, water, and agricultural sectors) to sustainably man­age water resources. A shorthand way to think of IWRM is ‘one water.’ To be most effective, IWRM should take into account water quantity and quality, surface water and ground water, salinity of coastal estuaries, land use, floodplain management, point and nonpoint sources of pollution, green and grey infrastructure, and climate change adaptation and mitigation.” [↑](#endnote-ref-2)
2. For example, see the Chicago Metropolitan Agency for Planning (CMAP) [GO TO 2040](http://www.cmap.illinois.gov/2040/main) comprehensive regional plan for northeast Illinois developed with some CWA funding, which includes these elements. [↑](#endnote-ref-3)
3. EPA issued watershed planning guidance at: <https://www.epa.gov/nps/handbook-developing-watershed-plans-restore-and-protect-our-waters>.

   [↑](#endnote-ref-4)
4. [CWA Section 303(e)](http://water.epa.gov/lawsregs/guidance/303.cfm) indicates that each state shall have a “continuing planning process” that will result in plans including effluent limitations; Section 208 areawide waste management plans; TMDLs; adequate implementation, including compliance schedules for revised or new WQS, etc. [CWA Sections 205(j)(2)](https://www.gpo.gov/fdsys/pkg/CFR-1996-title40-vol1/pdf/CFR-1996-title40-vol1-partA-subjectgroup-id869.pdf) and 518 authorize assistance to states and eligible tribes to carry out water quality management planning activities. CWA Section 604(b) grants assist states in implementing their water quality management programs. [↑](#endnote-ref-5)
5. See Attachment B for SWP-related information that the EPA regional SWP programs may be able to provide to EPA regional CWA programs, which the state can revise for their purposes. [↑](#endnote-ref-6)