

Guide for Using Clean Water Act Discharge Permits to Protect Drinking Water Sources: Source Water Collaborative Report



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

05/31/2024

A May 2024 report has been issued titled:

New Guide for Using Clean Water Act Discharge Permits to Protect Drinking Water Sources ("Guide").

The Guide was issued by the Source Water Collaborative ("SWC").

SWC describes itself as 30 national organizations:

... united to protect America's drinking water at the source – in the lakes, rivers, streams and aquifers we tap for drinking purposes.

The organization states it was formed in 2006 with the goal to:

... combine the strengths and tools of a diverse set of member organizations to act now and protect drinking water sources for generations to come.

Examples of the 30 members include:

- National Association of Counties
- Association of State Drinking Water Administrators
- USDA-NRCS
- USDA Forest Service
- Association of State and Territorial Health Officials
- National Association of Conservation Districts

The Guide is described as including "tips, tools, examples, and a template for providing comments on different types of NPDES permits, including permits with discharges that may contain PFAS and other contaminants."

The Guide's objectives include helping drinking water suppliers in:

- Understanding which upstream industrial, wastewater, stormwater, and nonpoint-source pollutant discharges are impacting, or have the potential to impact, the quality of their drinking water sources and associated treatment processes; and
- Learning how to provide comments, data, and information on the Clean Water Act NPDES permits for these sites and facilities to affect changes in monitoring, pollution discharge limits, and notifications to the drinking water suppliers

In addition to the Introduction, components of the Guide include:

- Clean Water Act and Permitting
- Permit Notification and Comment Submission
- Deciding What Permits to Focus On
- Understanding Permits
- Basic Categories of Permits
- Kind of Permit Limits
- Permit Structure
- Common Permit Comments
- After Permit Issuance
- Resources
- Glossary
- Endnotes
- Appendix A: comment Letter Template

A copy of the Guide can be downloaded [here](#).