

SDWA Fundamentals – Quick Reference

Regulation: Safe Drinking Water Act (42 U.S.C. §300f et seq.), 1974 with amendments 1986, 1996

T-5 Exam Focus: The framework every other rule hangs on. Know the terminology cold.

Key Terms & Definitions

Term	What It Means	Why It Matters
MCL	Maximum allowed contaminant level (enforceable)	Set as close to MCLG as feasible given cost and technology
MCLG	Health-based goal (non-enforceable)	Carcinogen MCLGs are always zero
Treatment Technique (TT)	Required process when an MCL isn't feasible	Turbidity limits, lead/copper action levels
MRDL	Maximum residual disinfectant level	Chlorine 4.0, chloramines 4.0, ClO ₂ 0.8 mg/L
Action Level	Trigger for treatment (not an MCL)	Lead 0.015, copper 1.3 mg/L at 90th percentile
BAT	Best available technology for a given contaminant	EPA designates BAT when setting each MCL

Public Water System Types

Type	Definition	Regulated?
CWS (Community)	Same 25+ people year-round	Yes
NTNC (Nontransient-Noncommunity)	Same 25+ people, 6+ months/year	Yes
TNC (Transient-Noncommunity)	25+ people, not the same population	Yes
Private wells (<15 connections, <25 people)	Not a public water system	No

EPA's Three-Step Regulatory Test

A contaminant gets regulated only when all three criteria are met:

1. May cause adverse health effects
2. Known or likely to occur in public water systems
3. Regulation presents a meaningful opportunity for health risk reduction

What to Watch on the Exam

- The MCL vs. MCLG distinction is a favorite exam question. MCLGs for carcinogens are always zero, but MCLs are set at feasible levels. Don't confuse them.
- **Primacy** means the state enforces the SDWA instead of EPA. California has had primacy since the beginning, through DDW under the State Water Resources Control Board. The catch is that state standards must be at least as stringent as federal, and California's often are more stringent.
- Variances vs. exemptions trip people up. A variance lets you exceed an MCL if you can't afford compliance (no unreasonable risk, must install BAT). An exemption gives temporary relief with a compliance schedule capped at 3 years.
- NPDWRs are enforceable. NSDWRs (secondary standards) are not enforceable at the federal level, but California makes its secondary standards enforceable. That's a California-specific detail worth remembering.

California Implementation Note

California administers the SDWA through the Division of Drinking Water (DDW) under the State Water Resources Control Board. State standards are often more stringent than federal, including enforceable secondary standards and California-specific MCLs for perchlorate (0.006 mg/L), hexavalent chromium (0.010 mg/L), and 1,2,3-TCP (0.000005 mg/L).

Source: 42 U.S.C. §300f et seq. & CA Title 22 CCR | H2oCareerPro.com