



CHEMICAL MONITORING WAIVERS

FACT SHEET SWP-104

June 2002

Chemical monitoring waivers reduce sample frequency in a compliance period or compliance cycle. Information to support the waiver must be provided by the PWS for consideration. A waiver must be given in writing by MDEQ and will specify which chemical(s) are included in the waiver, the time during which the waiver is in effect, and the sampling required for renewing the waiver. Monitoring requirements are fairly complex based on quarterly, semi-annual, annual, and tri-annual requirements within 3-year compliance periods and 9-year compliance cycles.

Public Water System Monitoring Waivers

Monitoring requirements are complex based on quarterly, semi-annual, annual, and tri-annual requirements within 3-year compliance periods and 9-year compliance cycles. Information to support a use or susceptibility waiver request must be provided by the PWS for consideration. A waiver will be given in writing by MDEQ and will specify which chemical(s) are included in the waiver, the time during which the waiver is in effect, and the sampling required for renewing the waiver.

I. Statewide Waivers

Under the statewide waivers, public water supplies are not required to sample for:

Endothall	Dioxin	Asbestos at the source
Diquat	Ethylene dibromide	Cyanide
Glyphosate	Dibromochloropropane	

Additionally, small water systems (3,300 or less) may be waived from initial quarterly monitoring requirements for the following chemicals (includes VOCs, PCBs, SOCs) by completing one round of organic chemical sampling without detects. This statewide waiver applies only to initial baseline requirements. Repeat sampling during subsequent compliance periods is required except where “use” or “susceptibility” waivers have been granted.

II. PWS Monitoring Waivers

Waivers can be requested in conjunction with the completion of the source water delineation and assessment report for a public water supply (PWS). Typically, the PWS operator will need to provide additional, site-specific chemical use information for parcels within the inventory region in order to process a waiver request. Waiver requests must be in writing.

A. Inorganic Chemical Waivers

Inorganic chemical (IOC) waivers are available. The IOCs eligible for waiver consideration are not typically related to land use activities hence they are usually either present or not in source water over the long term. DEQ will consider requests based on monitoring history, treatment and water quality. IOC waivers are not available for arsenic, nitrate/nitrite, lead/copper, and radiological monitoring.

Criteria for granting a waiver are:

1. Having at least three sampling events between 1993 and 2002;
2. At least one sampling event must be after 01/01/2002 (in the new compliance cycle);
3. All results must be consistently and reliably below the Maximum Contaminant Level (MCL).

B. Organic Chemical Waivers (VOC/SOC)

Organic chemical monitoring waivers reduce sample frequency in a compliance period or compliance cycle. Monitoring waivers are based either on chemical use in an area or the susceptibility of the source water to contamination.

1. Use Waiver

Use waivers may be available when it can be shown that specific organic chemicals have not or are not used, manufactured, or stored in a source water inventory region.

2. Susceptibility Waiver

Susceptibility waivers may be available when the source water is demonstrated to not be susceptible to contamination. Susceptibility is based on factors including hazard and the presence of barriers.

III. PWS Application Procedures for Waiver

A. Statewide waiver

- No application is needed.

B. IOC Waiver

- Send letter of request to DEQ
- Include most recent IOC monitoring results

C. SOC Use Waiver

- Send letter of request to DEQ include [MDEQ Form #1](#)
- Include most recent SOC monitoring results
- Include map that extends 1 mile from each well; show land use and chemical use history by land parcels. [MDEQ Form #2](#)***, or:
- Include annotated SWPA Inventory Region Map listing land use and chemical use history by land parcels. [MDEQ Form #2](#)**.

D. SOC Susceptibility Waiver

- Send letter of request to DEQ include [MDEQ Form #1](#)
- Include most recent SOC monitoring results
- Include completed [MDEQ Form #4](#), or;
- Include delineation, inventory, and susceptibility sections from SWDAR. Artesian conditions must be documented under all pumping regimes in order to achieve a susceptibility waiver.

E. VOC Use Waiver

- Send letter of request to DEQ include [MDEQ Form #1](#)
- Include VOC monitoring results
- Include map that extends 1 mile from each well listing land use and chemical use history by land parcel

[MDEQ Form #2](#)** , or:

- Include annotated SWPA Inventory Region Map listing land use and chemical use history by land parcel
- [MDEQ Form #2](#)** . Completion of [MDEQ Form #3](#) is optional

F. For VOC Susceptibility Waiver

- Send letter of request to DEQ include [MDEQ Form #1](#)
- Include SOC monitoring results
- Include completed [MDEQ Form #4](#), or;
- Include delineation, inventory, and susceptibility sections from SWDAR. Artesian conditions must be documented under all pumping regimes in order to achieve a susceptibility waiver.

The written request and supporting documentation should be forwarded to:

Ben Schendel
Montana Department of Environmental Quality
PO Box 200901
1520 E. 6th Avenue
Helena, Montana 59620.

** An inventory form (MDEQ Form #2) should be completed for each parcel and should include a map locator number, which cross references to land use description, and list of chemicals used or in-use. This site-specific information comes from parcel owners who should be contacted by the operator and asked to provide a list of herbicides, pesticides, solvents, or fuels and approximate quantity currently in use or stored on their property.