



Local Primacy Agency Program

The Division of Drinking Water and
Environmental Management

California Department of Public Health

History of the LPA Program

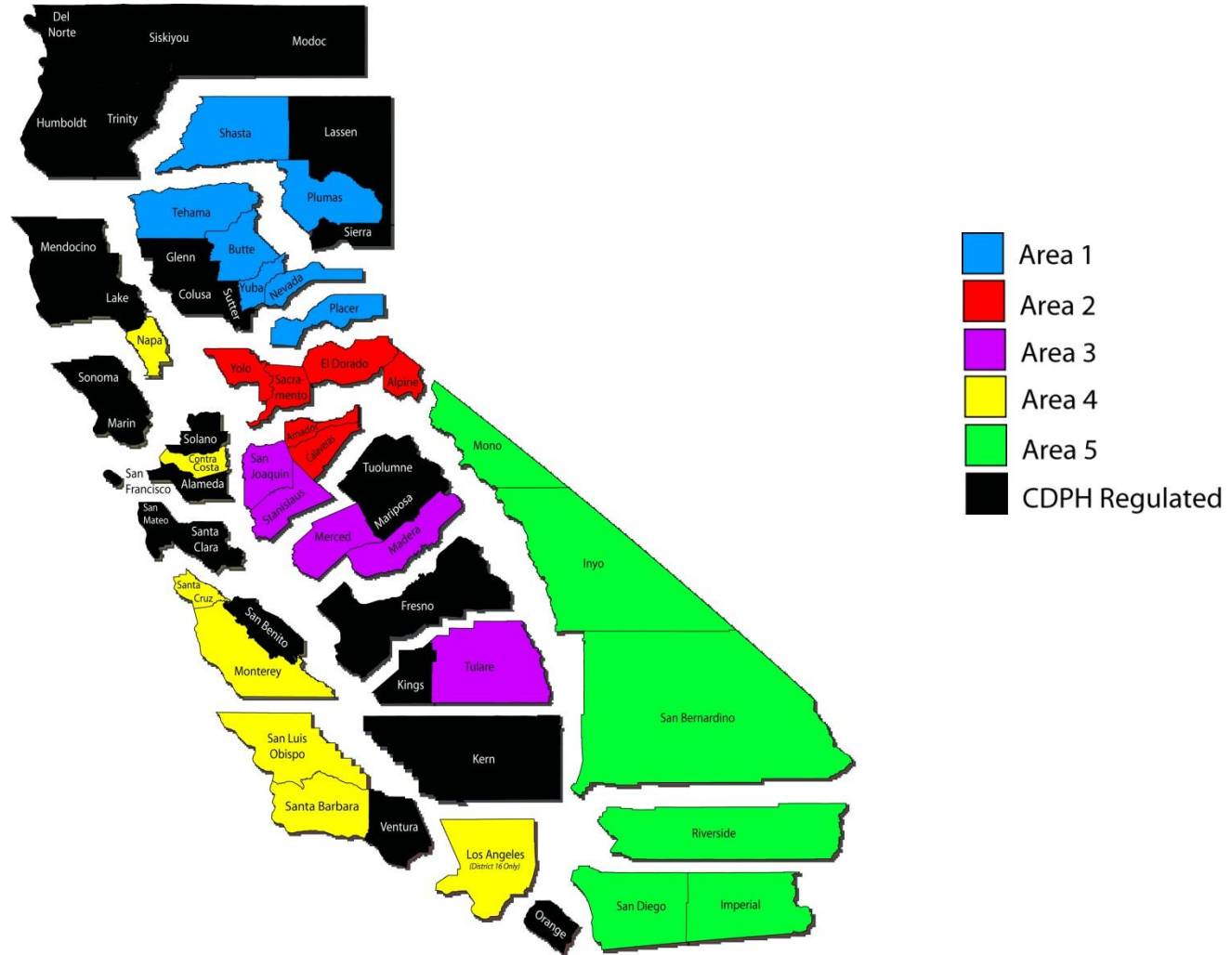
Prior to 1993:

- ▶ County health officers were responsible for any PWS less than 200 service connections
- ▶ State was responsible for any PWS greater than 199 service connections
- ▶ No standards in place for county regulatory programs and counties were not required to report any data
- ▶ In 1990, EPA identified that the delegation stated in the CA Safe Drinking Water Act (SDWA) lacked clear lines of responsibility and reporting requirements, resulting in a violation of the Fed-SDWA.

History Cont.

- ▶ Changes to the CA–SDWA to require primacy delegation for the counties to continue with oversight of their SWS, at the request of EPA.
- ▶ Regulations adopted that outlined the minimum requirements for an LPA.
- ▶ March 1993–the Department received applications from 35 counties with small water systems in the State, which were granted primacy of their SWS programs on July 1, 1993. One additional county was granted primacy in 2001.
- ▶ Five counties have returned the program to CDPH – Fresno (2007), Marin (2010), Tuolumne (2010), San Mateo (2011), and Kings (2014).
- ▶ Out of 58 counties, there are currently 31 LPAs statewide.

LPA Counties



LPA Minimum Requirements

- ▶ LPA regulates SWSs w/ <200 services connections and information is required to be sent to the State on the minimum elements included in Title 22 CCR Sections 64253–64260:
 - Permits
 - Surveillance
 - Sampling and Monitoring
 - Reporting
 - Enforcement
 - Program Management
 - Annual Workplans
- ▶ LPAs are required to be evaluated annually per HSC Section 116330.

LPA vs. State Regulated PWSs

Water System Type	No. of LPA Regulated Water Systems	No. of State Regulated Water Systems	% of LPA Regulated
Community	1,079	1, 938	36%
Non-Transient Non-Community	949	543	64%
Transient Non-Community	2,028	1,109	65%
Total PWSs Inventory	4,056	3,590	53%

CDPH Oversight Tasks

- ▶ Technical assistance and guidance to the LPAs is provided by the District Engineer of the Field Operations Branch District Office.
- ▶ Reporting requirements and compliance with the overall LPA program is accomplished through collaboration with the Small Water Systems Unit and the District Engineer.

LPA Challenges

- ▶ Complexity of drinking water regulations
- ▶ Annual operating fees do not sufficiently cover the time and money necessary to regulate water systems under LPA jurisdictions
- ▶ County employee turnover
- ▶ SWSs serving surface water and/or treating contaminated groundwater

New LPA Delegation Agreement

- ▶ Many new regulations have been promulgated since the 1993 agreements were executed.
- ▶ New regulations and requirements were not captured in old Agreement (1993).
- ▶ New delegation agreements are currently being reviewed and executed by the LPAs with a deadline of 11/30/2013.
- ▶ A one-time grant is being awarded upon execution of the Agreement to assist LPAs with increased compliance of regulations and requirements.