

Bob Danson

Dear Washington Department of Ecology and U.S. Environmental Protection Agency,
As General Manager of Olympic View Water & Sewer District, I am submitting the following comment on the draft 2026–2027 Performance Partnership Agreement (PPA) between the Washington State Department of Ecology and the U.S. Environmental Protection Agency. While we recognize that the PPA sets broad programmatic goals rather than specific permitting guidance, we believe it is essential that the agreement acknowledge the need for greater alignment between the implementation of the Underground Injection Control (UIC) program and the core requirements of the Safe Drinking Water Act (SDWA). Specifically, the non-endangerment standard requires that UIC wells "shall not endanger underground sources of drinking water" and prohibits injection activity that may endanger such sources, not only those that are already known to cause harm.

In our District, we raised concerns with Ecology when they allowed UIC wells to be permitted and installed within a designated Critical Aquifer Recharge Area and near Group A drinking water wells without sufficient hydrogeologic analysis or coordination with the local water system. Ecology's insufficient action to protect the District's aquifer is inconsistent with the non-endangerment standard and with the intended purpose of the UIC program under federal law. We respectfully recommend the following actions be reflected in the spirit and execution of the PPA:

- EPA and Ecology should reaffirm that protection of underground sources of drinking water, including shallow, vulnerable aquifers—remains a core objective of the UIC program in Washington.
- The PPA should support stronger cross-program coordination between UIC oversight and local source water protection planning, especially within CARAs and wellhead protection zones.
- Ecology should commit, under this partnership, to ensuring that infiltration systems proposed in sensitive groundwater areas are evaluated not only for compliance with surface water goals, but also for potential groundwater endangerment—even in the absence of documented contamination.
- Finally, Group A water systems should be explicitly recognized as critical stakeholders in UIC decision-making near their sources of supply.

These improvements would better align Washington's implementation of the UIC program with federal standards and reflect the shared priorities of the EPA and local utilities in protecting public health. Thank you for the opportunity to comment.

Sincerely,

Bob Danson

General Manager

Olympic View Water & Sewer District