

7 Step 7: Submitting Your WHP Plan

Introduction: what this step is about

Once your draft Wellhead Protection (WHP) plan is complete, you need to submit it to the Public Water Supply (PWS) Section of the North Carolina Department of Environment and Natural Resources. There, your plan will be reviewed to verify that it is complete, has followed all the steps outlined previously, and meets the requirements of the North Carolina Wellhead Protection Program.

The approval process typically involves some additions or revisions to the initial draft plan. PWS Section staff may have questions or issues that need to be clarified, or some necessary elements may have been omitted. Revisions may add several months to the time required for approval of your plan. If you follow the guidance in Steps 1 through 6, however, the need for revision should be minimal.

Procedure: what you need to do to complete Step 7 toward your WHP plan

What to submit



There are few specific requirements for the format of your WHP plan. The plan should start with a cover page that includes:

- Name of the water system
- Town and county
- PWS identification number (PWSID)
- Date
- Contact information for the person(s) submitting the plan

The Plan should include a chapter for each of the steps in the WHP plan process, plus maps, data forms, and other supporting information. A checklist for the plan contents is shown at the end of this chapter.

The plan should be well-organized; all text, tables, maps, and drawings should be typed or printed neatly and legibly; and the report should be stapled or bound so that all the pieces will stay together. One copy should be submitted; always keep at least one back-up copy in a safe place.

Where to submit your WHP plan

Submit your plan to:

Public Water Supply Section
Wellhead Protection Program
1634 Mail Service Center
Raleigh, NC 27699-1634
Ph: (919) 715-2853 Fax: (919) 715-4374

What to expect after you submit your plan

The time necessary for PWS Section staff to review your plan and respond to you varies depending on the number of plans under review at the time. The office strives for a two to four week response time. You may receive requests for additional information or suggestions for revision.

What kind of questions or requests can you expect? The questions or suggestions you receive depend on how thorough your planning team has been in developing your plan. Examples of requests that could be made following initial review are:

- Clarify the methods used to delineate the Wellhead Protection Area (WHPA);
- Give more detail on the Potential Contaminant Source (PCS) inventory and the risk classifications;
- Identify person/position responsible for certain elements of the plan;
- Provide a process for providing public notification on the availability of the WHP plan;
- Document the process for providing information to businesses located within the WHPA; and
- Consider a provision for managing threats from improperly constructed or abandoned wells within the WHPA.



You will receive a detailed letter stating any questions or comments and explaining what is needed for approval. There are no time limits for your response to such requests. However, revisions should be completed and submitted within a reasonable time; otherwise, a plan component such as a PCS inventory may become outdated and need to be redone.

Help with revisions

Members of the planning team can help answer some of the review questions. You may need to revisit your PCS inventory or decide on who is responsible for some of the plan implementation elements. If you need to seek outside help to respond to necessary revisions, you may wish to contact the North Carolina Rural Water Association (P.O. Box 540, Welcome, NC 27374; 336-731-6963). Public Water Supply Section staff can also assist you.

What to do with your plan

When your plan receives final approval, you will be notified in writing. When you receive this notification, take a few minutes and congratulate yourselves for the efforts you and your planning team made to ensure safe drinking water for your community's residents. Make sure local businesses and citizens know that your town has an approved local WHP program.

Remember, though, that just having an approved local WHP program is not the end of the story. Proper implementation, maintenance, and updating of your WHP plan are essential for your WHP program to be successful. Follow through on the plans you made and the strategy you outlined in Step 6. Keep in touch with the North Carolina PWS Section to stay up to date on water supply protection information and programs, such as the Source Water Assessment Program (SWAP). Periodically contact the North Carolina Division of Pollution Prevention and Environmental Assistance (DPPEA) for assistance in waste reduction and pollution prevention. Finally, remember to keep good records of your progress in implementing the plan. Documentation of proper implementation, maintenance, and updating of the approved WHP plan may be required to obtain priority rating points for future loan and grant applications.



Checklist for a complete WHP plan

Step 1: The Planning Team

- Names and roles of planning team members
- Problems and needs identified by planning team
- Goals of WHP plan and planning team
- Strategy for public participation

Step 2: Delineating the Wellhead Protection Area

- Basic information on water supply wells, e.g.:
 - Well owner, system name, location, town or community served
 - Date drilled
 - Well depth, casing depth, location of screens
 - Source of supply (aquifer)
 - Well yield, pumping rate, pumping period
- Map showing each well location, with a WHPA delineated
- Documentation and justification for method used to delineate WHPA

Step 3: Conducting a Potential Contaminant Source Inventory



- List of sources used to identify PCSs
- Printouts showing search results of each electronic database searched
- A sample of each survey questionnaire used to gather basic site information
- Summary of data from each type of survey
- Data Sheet for each PCS included in the WHP plan
- Inventory of PCSs for each well
- Criteria used for deciding which PCSs to include and the ranking system used
- List of PCSs grouped by higher, moderate, and lower risk for each well
- Documentation of public citizen involvement

Step 4: Developing Management Strategies

- Management strategy adopted for each PCS type occurring within the WHPA
- Documentation of public citizen involvement in the process of choosing management strategies

Step 5: Developing a Contingency Plan

- Forms and information for emergency contacts
- SOP documents for water supply workers
- Long-term and short-term plans addressing response procedures
- Documentation of public citizen participation in developing emergency procedures
- Plan for public notification in the event of emergency involving disruption of the water supply

Step 6: Implementing, Maintaining and Updating Your Plan

- Process for appointment of a local WHP program administrator
- Notification procedure for property owners within the WHPA
- Community Education brochure(s)
- Personnel assignments for responsibilities identified in the contingency plan
- Plans for training programs for local personnel
- Program for monitoring of PCSs and drinking water supplies through electronic databases, state agencies, and local personnel
- Implementation schedule
- Schedule and procedures for regular plan maintenance and update
- Procedures to update plans following construction of new well, after introduction of any new PCS located within the WHPA, or following any major land use changes in the WHPA

