

## **Frequently Asked Questions** **re: Governor's Orders for 10% Water Use Reductions.**

### **1. What does the Governor's new direction mean?**

In further response to the exceptional drought conditions, Governor Sonny Perdue has directed the Environmental Protection Division to modify current surface water and groundwater withdrawal and drinking water permits to achieve a 10 percent reduction in water withdrawals / production in the [Level 4 counties](#). Permit holders will be required to reduce water withdrawals / production by 10 percent compared to water withdrawal / production during last winter (i.e. baseline - December 2006 through March 2007).

### **2. What/who is a "permit holder"?**

A permit holder is a city, county, authority, industry, private business, and/or individual who holds a surface water withdrawal permit, a groundwater withdrawal permit, and/or a drinking water operating permit issued by EPD. These new measures do not apply to farm permit holders.

### **3. My city/county/industry/household has already invested in infrastructure and/or water conservation measures. Why do I need to do more when others have done so much less?**

We are currently in an exceptional drought. In addition, the forecast is for a warm, dry winter that may not provide replenishing rains. Therefore, Governor Perdue has ordered that a state of emergency exists in much of Georgia. It is important for all permit holders in the Level 4 counties to participate in conserving our remaining water resources.

### **4. How will this be implemented?**

This week, EPD will modify all existing permits. This reduction requirement will become effective starting on November 1, 2007.

### **5. How is the baseline monthly average calculated?**

Existing permits require reporting of the monthly average water withdrawal / production for each calendar month. This calculated baseline is the average of the four monthly averages from December 2006 to March 2007, inclusive. All permit holders are encouraged to calculate their baseline to know their new withdrawal / production limit.

### **6. What if my flows between December 2006 and March 2007 were abnormally low or zero? What if I have a new permit and was not in operation during that period? What if a new high water use industry has come to town in recent months? What if fire-fighting water needs cause the 10% reduction requirement to not be met?**

EPD will work with individual permit holders on a case-by-case basis to resolve issues such as these.

**7. How will this be enforced?**

Compliance with this 10% reduction will become a permit condition. Failure to achieve this reduction will be a permit violation subject to fines and other penalties. For enforcement purposes, EPD will be checking reported water withdrawal / production amounts monthly against the new baseline requirement.

**8. What are some ideas for achieving this 10% reduction?**

For utilities: Reduce unaccounted for water, survey distribution system for leaks, meter all sources and service connections, provide water conservation education to customers, target specific reductions, raise water rates for high water users, provide incentives for installation of water saving fixtures.

For businesses: Apartment complexes should consider metering each unit. Restaurants can use paper and plastic plates and utensils to cut down on dishwashing. Hotels and motels could reduce laundering of towels and sheets whenever possible. Low water-use, office-based businesses can save water by reducing flushing, repairing leaks, etc. Businesses that use water in manufacturing or processing should conduct water audits to identify leaks and inefficiencies. Additional information on water audits can be found at <http://www.gadnr.org/cws/>.

For households: Indoor water used can be reduced by washing only full loads of dishes and laundry, taking a shorter shower, and by fixing leaky faucets and toilets. Additional water conserving tips and resources can be found at <http://www.conservewatergeorgia.net/>.

**9. Why is this the responsibility of permit holders?**

By placing the responsibility for reductions on permit holders, local utility leaders can determine the amount and balance of impacts on residential, industrial, and commercial customers. Since the customer base and opportunities vary in each local area, this approach allows local options and control to develop an approach most appropriate to specific local situations.

**10. What other methods are being implemented to conserve water?**

In addition to implementing the Level 4 outdoor water use schedule and modifying permits to reduce water use, the State and local water providers are undertaking additional efforts to minimize the impacts of this exceptional drought. These efforts include: developing a water conservation public outreach plan, implementation of the WaterSmart public education program, permitting additional groundwater wells, where appropriate, identifying additional interconnections between water systems to provide reliability, and identifying additional sources of water.

**11. How long is the 10% reduction requirement in effect?**

The requirement is in effect until further notice to permit holders by EPD.

**12. What if a permit holder does not have the needed historical data available to calculate their new baseline requirement?**

A permit holder should contact the EPD Program that issued their permit for this information.

**13. I hold both a water withdrawal permit and an operating permit. Do I have liability for enforcement actions on both permits for the same withdrawal?**

If you hold both a water withdrawal and an operating permit, compliance with the 10% reduction will be calculated on your operating permit. This allows you the flexibility to withdraw for raw water storage while requiring a reduction in use.

**14. I don't have a withdrawal permit, only an operating permit for a distribution system. Does the 10% reduction apply to me?**

Yes.

**15. I have multiple water sources and/or connections from other public water systems into my distribution system. Some water sources and/or connections are more stressed than others. Can I increase the less stressed source if my overall usage is reduced?**

We need to reduce overall water usage. If you system has multiple water sources, we want to reduce of the most stressed resource first while documenting that the overall usage as decreased. Please confirm with EPD that use of a particular source can be increased so that we can ensure that other systems are not adversely affected. Below is an example calculation:

<b>Multiple Sources Example Calculation</b>					
<b>Water Source and Water Connected to System</b>	<b>Winter 06-07 (MGD)</b>	<b>10% Reduction (MGD)</b>	<b>Modified Permit Limits (MGD)</b>	<b>Example of Actual Usage (MGD)</b>	<b>Compliance?</b>
Source 1 (most stressed)	2.0	0.2	1.8	1.25	>10% reduction, good to relieve most stressed resource
Source 2 (least stressed)	0.5	0.05	0.45	1.00	Increased usage to offset more stressed resource. Okay if total is reduced.
Source 3	1.0	0.1	0.9	0.9	10% reduction, in compliance
Total	3.5	0.35	3.15	3.15	10% reduction overall indicates compliance

**16. I hold an operating permit and sell water to another entity that holds an operating permit for their distribution system. What if I reduce but they don't?**

The 10% reduction applies to each permit holder. If the seller can show a water use reduction, except for water sold to the buyer, this will be taken into consideration when determining compliance. Below is an example calculation:

<b>Buyer/Seller Example Calculation</b>					
<b>Entity</b>	<b>Winter 06-07 (MGD)</b>	<b>10% Reduction (MGD)</b>	<b>Modified Permit Limits (MGD)</b>	<b>Example of Actual Usage (MGD)</b>	<b>Compliance?</b>
Seller net	7	0.7	6.3	6.0	>10% reduction, in compliance
Buyer	3	0.3	2.7	2.9	<10% reduction, violation
Seller production	10	1.0	9.0	8.9	Not used to determine compliance

**17. I sell water to another entity or entities with multiple sources. Their other sources are stressed and I can sell them more water. How will compliance be calculated?**

Similar to the above. See the following 2 tables for the compliance calculations associated with both the buyer and the seller:

<b>Seller Example</b>					
<b>Entity</b>	<b>Winter 06-07 (MGD)</b>	<b>10% Reduction (MGD)</b>	<b>Modified Permit Limits (MGD)</b>	<b>Example of Actual Usage (MGD)</b>	<b>Compliance?</b>
Seller usage	5.0	0.5	4.5	4.5	Seller in compliance
Buyer usage	1.0	0.1	0.9	3.0	Buyer evaluated below
Total	6.0	0.6	5.4	7.5	Not used to determine compliance

<b>Buyer Example</b>					
<b>Entity</b>	<b>Winter 06-07 (MGD)</b>	<b>10% Reduction (MGD)</b>	<b>Modified Permit Limits (MGD)</b>	<b>Example of Actual Usage (MGD)</b>	<b>Compliance?</b>
Buyer from above seller	1.0	0.1	0.9	3.0	Not used to determine compliance
Other source (more stressed)	4.5	0.45	4.05	1.95	Not used to determine compliance, good to reduce stressed resource by >10%
Total water used	5.5	0.55	4.95	4.95	Total usage reduced by 10% - in compliance.

**18. A water system is trying to implement the 10% water reductions. They met with their 15 largest water users who use 85% of the water to tell them to reduce their water use. One large industrial use says their water usage was down by 50% for the period November 26 – March 2007 when compared to other years because of a temporary plant shutdown and cutbacks in normal production rates. They point out that it is unfair to base their 10% reduction on an atypical water use period and that the plant would have to close if they had to comply with the reductions. What should the water system do?**

In this case, the water system should base the 10% reduction on typical winter water use and be prepared to document this information for EPD.

**19. How did EPD determine that 10% was the desired level of water use reduction?**

EPD analyzed water use data in the Level 4 counties and reviewed data about achievable per capita usage. Finally, we made a judgment call that 10% was the right reduction amount at this time.