unrealistic in most complex geohydrologic systems. Also, preventing interchange of bad quality/good quality ground water is difficult if the hydrologic systems naturally provide for this interchange.

Finally, the strategy intends to improve EPA's institutional capability, institute regional ground-water programs and build institutional capabilities in the States. The strategy also will create a policy for consistency and coherence among the various EPA programs that involve ground-water protection. These are excellent objectives and appear to have good chances for success.

It is difficult to assess the potential effect of EPA's Ground-Water Protection Strategy on DOE sites if the strategy is implemented as it presently stands. If a strict interpretation of the strategy is made and the letter of the policy (as opposed to the intent) is held to, then attempts could be made to impose unrealistic requirements on major DOE sites (such as Hanford) where plant operations have had considerable impact on ground-water quality. Past waste disposal practices at these sites, which were acceptable (and perhaps even conservative) at the time but now probably are unacceptable under present environmental protection standards, have resulted in extensive contamination of the ground water by radioactive and non-radioactive elements. The aquifers at the sites would most likely be classified as category II (current or potential sources of drinking water), even though the ground water generally is not used for drinking water on-site. Initial attempts could be made to require restoration of the ground-water to drinking water or background quality. It is not reasonable that this could or would be enforced; because even if it was technically feasible (which it is not) to attempt clean-up of the huge volume of ground water involved, it would be impossible economically. However, convincing the administrators and regulators of this fact might take considerable time, effort and funds.

A more likely scenario would be an attempt to halt ongoing waste disposal activities (such as at Purex) that could be viewed as contributing to additional ground-water contamination.

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