

# LEGISLATIVE AND REGULATORY UPDATE

WATER WORKS OPERATORS' ASSOCIATION OF PENNSYLVANIA  
ANNUAL CONFERENCE | OCTOBER 4, 2021

SERENA A. DIMAGNO



SPOTTS | STEVENS | MCCOY

Engineering, Surveying and Environmental Services

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# LEGISLATIVE UPDATE



# LEGISLATION SIGNED INTO LAW BY GOVERNOR WOLF



## LEGISLATIVE UPDATE

# House Bill 957 – Signed into Law as Act 43

- **June 30, 2021 - Effective in 60 days.**
- Amends the Municipal Authorities Act to allow an owner of a property with multiple units served by a single water meter to periodically request the authority to adjust the amount billed by showing a minimum of five consecutive years of actual usage data to determine if the amount billed exceeds the amount of water actually used by 30% or more.
- If the usage data shows that an adjustment is needed, the authority shall appropriately adjust the billing and use the adjusted amount going forward. When calculating the new amount, the authority may include up to 10% over the amount used.
- After an initial adjustment, the owner may not request another adjustment for five years after the adjustment is completed.



# LEGISLATION



# 2021 Legislature Schedule

## House Schedule:

September 27, 28, 29

October 4, 5, 6, 25, 26, 27

November 8, 9, 10, 15, 16, 17

December 13, 14, 15

## Senate Schedule:

September 20, 21, 22, 27, 28, 29

October 18, 19, 20, 25, 26, 27

November 15, 16, 17

December 13, 14, 15



## LEGISLATIVE UPDATE

# House Bill 97 – Lawrence

- Amends Title 66 (Public Utilities) in rates and distribution systems, providing for valuation of acquired water and wastewater systems.
- Requires a ratepayer referendum to be conducted by a selling utility with a fair market value of \$1 million or more.
- If a majority of ratepayers vote against the proposed sale via referendum, then the Public Utility Commission (PUC) would be required to disapprove the sale.
- The House Appropriations Subcommittee on Government and Financial Oversight and the House Consumer Affairs Subcommittee on Public Utilities held a joint hearing on 5/26/2021.



## LEGISLATIVE UPDATE

# House Bill 144 – Sappey

- Amends Title 66 (Public Utilities) in rates and distribution systems, providing for valuation of acquired water and wastewater systems and providing for water ratepayer bill of rights.
- Proposes that a publicly managed utility contemplating selling itself would be required to mail a ballot to each ratepayer of the utility asking “Do you approve the sale of (selling utility name) to (acquiring public utility or entity) for the sum of (the proposed sale price)?” Ratepayers would have a minimum of 30 days to vote via US mail or through a secure internet website.
- In addition to mailing a ballot to each ratepayer, a selling utility would be required to publish notification of the referendum in a newspaper of major circulation in any affected municipality. If a majority of ratepayers vote against the proposed sale via referendum, the PUC would be required to disapprove the sale.





## LEGISLATIVE UPDATE

# House Bill 144 – Continued

- Requires water and wastewater utilities to publish an annual report with average residential billing amounts information.
- Requires water and wastewater utilities to engage in mandatory information collection on rate increases, arrearages, service disconnections and water-lien sales.
- If passed, would be effective in 90 days. 5/26/21 discussed during joint public hearing with House, House Consumer Affairs Appropriations.
- **Senate Bill 452 – Kane, is identical to HB 144.** In the Senate Consumer Protection and Professional Licensure Committee, 4/9/2021



## LEGISLATIVE UPDATE

# House Bill 527 – Cox

- Amends Title 53 (Municipalities Generally) providing for public notice and public meeting requirements.
- Proposes that prior to entering to an agreement to sell or lease a water or sewer system owned or operated by a municipal corporation or municipal authority would require dissolution by the municipal corporation.
- The municipal corporation shall:
  - Hold at least one advertised public meeting, not more than 60 days nor fewer than seven days prior to entering into the agreement.
  - Provides for public notice of the meeting in all municipalities served by the water or sewer system, and that the potential purchaser or lessee shall be in attendance.
  - Amendment #A02423 would add a municipal website to the definition of “public notice”.
  - “Public notice”. Notice published once each week for two successive weeks in a newspaper of general circulation AND ON THE MUNICIPAL CORPORATION’S WEBSITE, IF THE MUNICIPAL CORPORATION HAS A PUBLICLY ACCESSIBLE WEBSITE.
- Reported, as amended, unanimously in House Local Government Committee – 9/29/2021. The bill now goes to the House for full consideration.



## LEGISLATIVE UPDATE

# House Bill 591 – Zimmerman

- Reintroduced (prior HB 534 – 19/20 Session) – Amends the Clean Streams Law
- Proposes to allow construction sites that result in a land disturbance of more than one but less than five acres to apply for a waiver of an otherwise required National Pollutant Discharge Elimination System (NPDES) Permit, in accordance with Title 40, CFR 122.26(b)(15)(i).
- States surrounding Pennsylvania comply with the NPDES waiver program that already exists on the federal level.
- This bill would bring Pennsylvania's NPDES program into the same standards as the federal and surrounding state programs.
- Passed the House by a vote of 115 to 84 on 9/28/21. The bill now goes to the Senate for consideration.



## LEGISLATIVE UPDATE

# Senate Bill 302 - Yaw

- Firefighting Foam Management Act
- Restricts the use of foam containing PFAS chemicals beginning July 1, 2022.
- Directs the Pennsylvania Emergency Management Agency (PEMA), in consultation with the State Fire Commissioner to assist firefighting entities with evaluating and determining how to transition to the use of class B firefighting foam that does not contain PFAS chemical. Use of firefighting foams during emergency situations would not be impacted.
- If approved, PA would follow Colorado, Kentucky, Virginia and Washington that have enacted laws banning the use of PFAS chemicals in firefighting foams.
- Passed by the full Senate, 9/21/2021, now moves to the House for consideration.



## LEGISLATIVE UPDATE

# Organizations Send Letter – Re: PFAS Contamination of Public Water Supply System

- Pennsylvania Section AWWA, Pennsylvania Municipal Authorities Association, Pennsylvania Rural Water and Water Works Operators' Association of Pennsylvania sent a letter to the PA Department of Environmental Protection and the Office of the State Fire Commission on August 17, 2021 requesting a meeting.
- The request was made in response to the McKeesport public water supply being contaminated with PFAS following a firefighting incident on July 16, 2021. PFAS firefighting foam was used to suppress a fire and was siphoned into the public water supply.
- 256 customers were unable to use their water for two weeks following the incident.
- To date, a meeting has not been scheduled to find cooperative ways and means to prevent similar incidents from occurring.



## LEGISLATIVE UPDATE

# Senate Bill 478 - Dush

- Authorizes political subdivisions, municipality authorities and transportation authorities to enter into contracts for the purchase of goods and the sale of real and personal property where no bids are received.
- Received final passage in the Senate – 6/15/2021.
- Received in the House and referred to the House Local Government Committee – 6/16/2021.



## LEGISLATIVE UPDATE

# Senate Bill 525 - Gordner

- Amends Title 27 (Environmental Resources) environmental stewardship and watershed protection, further providing that the people of Pennsylvania have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment, and the commonwealth has an obligation to provide greater investments to conserve land and water resources, restore damaged waterways and land, and create prosperous and sustainable communities.
- Provides for funding of \$500 million from money received by the commonwealth from the federal government under the American Rescue Plan Act of 2021 for fiscal year 2021-2022 and thereafter.
- This is the “Growing Greener III” legislation. A sponsor summary may be found at <https://www.legis.state.pa.us//cfdocs/Legis/CSM/show/MemoPublic.cfm?chamber=S&SPick=20210&cosponID=35059>
- Reported out of the Senate Environmental Resources and Energy Committee Meeting, 9/28/2021 with Bi-partisan support. The bill now moves to the full Senate for action.



## LEGISLATIVE UPDATE

# Senate Bill 545 - Yaw

- Amends the Clean Streams Law, regarding pollutions and potential pollution, providing for notice of discharge endangering public health or environment.
- A person who spills, discharges or releases a substance into waters of the Commonwealth, or on a location from which the substance is likely to enter the waters of the Commonwealth, taking into account any control or remedial measures, shall notify the PA DEP if the spill, discharge or release is not authorized by permit and is likely to render the receiving waters harmful to public health or the environment as determined by reportable quantities or other readily ascertainable standards adopted by regulation.
- Requires the Environmental Quality Board (EQB), no later than 60 days after the effective date of the new section, to publish for public comment proposed regulations establishing reportable quantities.
- 9/21/21 – On the Senate Calendar.





## LEGISLATIVE UPDATE

# SB 597 - Stephano

- Amends Title 66 (Public Utilities) providing for water and wastewater asset management plans.
  - **Community water and wastewater system asset management plan:**
    - No later than 12 months after the effective date, a water or wastewater system operator shall annually submit an asset management plan every 3 years to the Public Utility Commission (PUC) for review and approval.
    - The plan shall be designed to inspect, maintain, repair and renew the water or wastewater system operator's infrastructure consistent with federal and state laws.
  - **Critical valve inspections:**
    - A water system operator shall inspect each critical valve in its system (in the asset management plan), no less than every three years and at any time the water system operator installs, repairs or relocates a critical valve.



## LEGISLATIVE UPDATE

# SB 597 – Continued

### – Fire hydrants

- A water system operator shall annually inspect at least 33% of the fire hydrants in the system in a manner that each fire hydrant is exercised over the course of four years to determine each fire hydrant's working condition.
- The water system operator shall formulate and implement a plan for flushing fire hydrants and at dead ends of water mains as water quality needs dictate.
- The water system operator shall keep a record of each inspection, test and flushing for six years.
- The water system operator shall identify the geographic location of each fire hydrant using a global positioning system based on satellite or other location technology.

### – Water meters:

- A water meter that has a registration error of more than 2% may not be placed in service and a water meter that has a registration error of more than 4% may not remain in service if water is passing through the meter at certain flow rates (meter size to gallons per minute).



## SB 597 – Continued

- **Development of cybersecurity system**
  - A water and wastewater system operator shall develop a cybersecurity program that:
    - Is developed by an accredited cybersecurity professional
    - Implements organizational accountability and responsibilities for cyber risk management activities; and
    - Establishes policies, plans, processes and procedures for identifying, reporting, and mitigating cyber risk to the system
  
- **Contingency for public funding**
  - Before a water or wastewater system operator may receive a subsidized loan or other financial assistance from the Commonwealth, the system must demonstrate that the operator has developed or is in the process of developing an asset management program.



## LEGISLATIVE UPDATE

# SB 597 – Continued

### – Enforcement

- A water or wastewater system operator that fails to file an asset management plan or comply with a PUC approved plan shall be deemed a public utility and be regulated as a public utility by the PUC.

Status: Senate Consumer Protection & Professional Licensure Committee, 4/22/2021 – Reported, as amended, 5/25/2021 – 1<sup>st</sup> Consideration, 5/25/2021; Scheduled for 2<sup>nd</sup> Consideration 9/20/21. On 9/22/21 SB 597 was marked over on the calendar, with no action taken.

**Note: The Water Works Operators' Association of Pennsylvania (WWOAP), The Pennsylvania Rural Water Association (PRWA), the Pennsylvania Municipal Authorities Association (PMAA) The Eastern Pennsylvania Water Pollution Control Operators' Association (EPWPCOA), and the Pennsylvania Water Environmental Association (PWEA) have all submitted letters to the Legislature in Opposition to SB 597.**



## SB 597 – Continued - ISSUES

### ISSUES WITH SB 597:

- Asset Management Plan – requiring community water systems to publish asset management reports on publicly accessible Internet websites is in direct violation of security protocols that have been in place since 9/11. Providing descriptions and locations of vulnerable water system infrastructure in a public format is inviting potential security breaches to critical water supply systems and risking public health and welfare.
- Critical valve inspections – Community water systems currently follow best management practices recommended by the valve manufacturers and the American Water Works Association (AWWA).



## SB 597 – Continued - ISSUES

### ISSUES WITH SB 597:

- Water Meters - meter maintenance is dictated by the manufacturers' recommendations. The additional testing mandated in SB 597 would require considerable additional costs to water systems. The proposed requirements need to have a value vs. cost analysis completed to assess the benefit provided to water system customers/consumers to justify the requirements.
- Development of Cybersecurity System – Both PA DEP and the Department of Homeland Security have provided self-assessment tools for water systems to evaluate system and cybersecurity vulnerabilities. Further, the America's Water Infrastructure Act (AWIA) strengthened the requirements for systems to self-assess asset and cyber vulnerabilities. The information is specifically NOT TO BE SHARED with EPA or other regulatory entities, but is certified by the system to have been completed. All certified system operators are also required to complete security training. NO STANDARD CERTIFICATION EXISTS FOR CYBERSECURITY PROFESSIONALS as is required under SB 597.



## LEGISLATIVE UPDATE

# SB 597 – Continued - ISSUES

- Annual Information to Customers – water systems already complete and provide to all customers a Consumer Confidence Report (CCR) annually under Chapter 109, Safe Drinking Water Regulations. Moreover, the Public Notification Rule requires one-hour notice to PA DEP and notice to the customers. EPA under the Revised Lead and Copper Rule is revising the CCR requirements to require bi-annual reports be submitted to customers.
- Contingency for Public Funding – All Commonwealth funding sources currently require that water systems be in compliance with the Safe Drinking Water Regulations and/or require engineering, feasibility studies and financial analysis for the majority of projects under funding consideration.
- Enforcement – Under no circumstances should a water system be placed under the jurisdiction of the PUC without customers/consumers of that system being given the opportunity to contest their local municipal authority or municipal system being summarily regulated by the Commission.



## LEGISLATIVE UPDATE

# Senate Bill 832 - Yaw

- Amends Title 3 (Agriculture) and 27 (Environmental Resources), in Conservation Excellence Grant Program, further providing for criteria for evaluation of applications; and providing for nonpoint sources pollution reduction.
- Adds a section related to nonpoint source pollution reduction and introduces pay-for-success approaches to spur further innovation and private investment.
- Establishes the Clean Streams Fund in the State Treasury, appropriates at least \$250 million to the fund for fiscal year 2021-2022, and provides for the distribution of the funds.
- Establishes the Agriculture Conservation Assistance Program and the **Pennsylvania Clean Water Procurement Program** and provides for duties of PENNVEST under that program. This program was in SB 525 last session.
- These programs are proposed to be funded by the federal monies from the American Rescue Plan Act of 2021.
- **However, during the past few sessions, the Senate has targeted a water withdrawal fee to pay for this program. This legislation bears watching closely as well as any code bills around budget time to ensure that a water withdrawal fee is not used as a funding mechanism.**
- Reported as amended in Senate Environmental Resources and Energy Committee 9/28/21. The bill now goes to the full Senate for consideration.





## LEGISLATIVE UPDATE

# September 22, 2021 – Co-sponsorship Memo Acquisitions of Distressed Water and Wastewater Systems

Representatives Krueger and Lawrence plan to introduce legislation to amend Title 66, Section 1329 of the Public Utilities Law to prohibit the use of Section 1329 for the sale of municipal or authority owned water or wastewater systems to private companies **using the valuation procedure outlined in the section unless the system is in financial and/or operational distress.**

The Consumer Advocate testified in a hearing earlier this year that Section 1329 sales always drive up rates for customers of those systems. To protect ratepayers, those sales should be limited to systems that truly need outside help to meet financial or operational best practices. Status: Senate Consumer Protection & Professional Licensure Committee, 4/22/2021 – Reported, as amended, 5/25/2021 – 1<sup>st</sup> Consideration, 5/25/2021; Scheduled for 2<sup>nd</sup> Consideration 9/20/21. On 9/22/21 SB 597 was marked over on the calendar, with no action taken.



## LEGISLATIVE UPDATE

# Senate Bill 1285 (2019-2020) - Stephano

- Amends the Pennsylvania Safe Drinking Water Act, Chapter 109 regarding public water systems requirements for the control of Legionella.
- Proposes to require public water systems to have responsibility for water quality control within buildings covered under the proposed regulation:
  - Health care facilities where patients' stays exceed 24 hours
  - Buildings that contain whirlpool or spa in the building or on site
  - Buildings housing occupants 65 years of age or older
  - Buildings with ornamental fountains, misters, atomizers, air washers, humidifiers or other devices that release aerosols in the building or site
  - Buildings that include open-circuit and closed-circuit cooling towers or evaporative condensers that provide cooling or refrigeration, or both, for the heating, venting, air-conditioning or refrigeration system or other systems or devices in the building
  - Buildings with multiple housing units with one or more centralized potable water-heater systems
- **Proposes that water systems be required to maintain a minimum free chlorine residual of 0.5 mg/l or a combined residual of 1.0 mg/l in all parts of the distribution system at all times.**
- The Senate Democratic Policy Committee held a hearing on 5/5/2021 – The Water Works Operators' Association presented testimony in opposition to SB 1285.
- This bill has not been re-introduced in the 2021 session. Following the Committee hearing serious reconsideration of the bill needs to occur before the bill is introduced. The bill was marked OVER on the Senate calendar 9/22/2021 – No Action.



# REGULATORY UPDATE



# PA DEP Small Water Systems Technical Advisory Committee (TAC Board) - Change

- At the January 28, 2021 TAC Board Meeting, the Board voted to accept the By-Laws Committee recommendations to change the Small Water Systems Technical Advisory Center (TAC) name to better represent the function of the Board.
- **NEW NAME: The Public Water System Technical Assistance Center Board (TAC Board)**
- Provides direction and advice to the PA Department of Environmental Protection on water systems technical and management assistance programs
- Comment on policies, guidance and regulations as they may affect **all** public water systems with
- Emphasis on the unique effects on small public water systems



## Maximum Contaminant Level for PFAS

- PA DEP completed statewide PFAS Sampling. Full results are available at: [www.dep.pa.gov/pfas](http://www.dep.pa.gov/pfas)
- Summary of PA DEP's Report:
  - Based on Drexel University's Toxicological Study and PA DEP's Sampling Plan Data, PA DEP concluded that additional measures were needed to protect public health.
  - PA DEP agreed with the Delaware Riverkeeper Network (DRN) that PA DEP should move forward with a proposed rulemaking to set an MCL for PFOA, but PA DEP did not believe DRN's proposed MCL of six (6) parts per trillion was developed appropriately.
- On July 29, 2021, PA DEP presented a **PRE-DRAFT MCL RULEMAKING for PFAS** at the Public Water System Technical Assistance Center (TAC) Board Meeting.



## Maximum Contaminant Level for PFAS – Cont'd.

- PA DEP is moving forward with MCLs for PFOA and PFOS.
- PA DEP is not moving forward with an MCL for other PFAS chemicals at this time:
  - Lack of occurrence data > MCLG
  - Incomplete cost/benefit data and analysis
  - Reference dose was not derived due to lack of evidence on its toxicity
  - Lack of treatability data
- **PROPOSED PFOA MCL of 14 parts per trillion (ppt) (current EPA Health Effects Limit = 70 ppt)**
- **PROPOSED PFOS MCL OF 18 parts per trillion (ppt) (current EPA Health Effects Limit = 70 ppt)**
- The Proposed MCLs are within the range of other Federal Standards where the MCL does not equal the MCLG.
- The Proposed MCLs are within the range and same magnitude as other state standards.



## Maximum Contaminant Level for PFAS – Cont'd.

- The following documents are available at:  
<https://www.dep.pa.gov/PublicParticipation/AdvisoryCommittees/WaterAdvisory/TAC/Pages/2021-Meetings>
  - PRE-DRAFT PROPOSED PFAS RULE
  - PRE-DRAFT ANNEX A, PROPOSED PFAS RULE
- **JULY 29, 2021 - TAC BOARD** voted to approve the Draft Proposed PFAS RULE for PA DEP to move forward with the regulatory process.



## Water Quality Standard for Manganese

- (#7-533) Administrative Code of 1929, Pennsylvania Clean Streams Law, Federal Clean Water Act 25 Pa Code Chapters 93 and 96.
- Published in the PA Bulletin on July 25, 2020 with the comment period ending 9/25/2020. **The Final Regulation is expected the 1<sup>st</sup> Quarter, 2022.**
- Proposes a new human health criterion for manganese of 0.3 mg/l in Chapter 93.8 – Water Quality Criteria for Toxic Substances and would delete the existing 1 mg/l standard because it is not protective of human health.
- Research conducted by PA DEP concluded the effects of manganese on human health is harmful as a nervous system toxin with impacts to early childhood development and that 0.3 mg/l is protective of human health.
- Proposes two alternative points of compliance:
  - All existing or planned surface potable water supply withdrawals **OR**
  - All surface waters at point of discharge





## Water Well Construction Standards

- Currently there is no required training, examination, or enforcement of water well drillers to ensure private water wells are safely sited, and/or built properly in Pennsylvania.
- Currently, there are no statewide construction/siting standards for the drilling of private wells in Pennsylvania.
- Under the Water Well Drillers License Act (Act 610 of 1955), water well drillers are required to be licensed, but the Act does not require training or certification for well drillers and rig operators.
- To obtain a well driller's license, individuals and businesses must simply contact DCNR Bureau of Geological Survey at 717-702-2017. Drillers are assigned a four-digit license number which serves as the log-in-username for WebDriller – an online tool for well drillers to enter well information.
  - License year runs from June 1 to May 31 of the following year
  - License renewals are made online through WebDriller
  - License cost is \$60.00 per year and rig permits are \$20.00 per year



## REGULATORY UPDATE - PENNSYLVANIA

# Water Well Construction Standards – Cont'd.

- In Pennsylvania, a well drillers license does not imply that a driller has the knowledge or experience needed for proper drilling or well construction practices.
- ISSUES: Significant impact on public health, public safety, and consumer protection. No sufficient accountability of the water well industry and no recourse for homeowners if a well is improperly sited or drilled. **Deficient private wells can compromise public water supply well sources.**
- **DCNR Proposing Policy Goals:**
- **Goal 1:** Establish statewide certification and licensing standards for water well drillers that include training requirements and an examination to demonstrate aptitude in the field and understanding of best industry practices.
- **Goal 2:** Establish statewide construction and siting standards for private water wells through best industry practices to safeguard the health and safety of Pennsylvanians by ensuring access to safe drinking water.
- The PA Section AWWA Water Utility Council (WUC) (WWOAP is a member of WUC) has been asked by DCNR's Office of Planning and Policy for help with this issue. WUC is meeting on October 15, 2021 and Water Well Construction Standards is on the Agenda for discussion.



## EPA CONTAMINANT CANDIDATE LIST 5 (CCL 5)

- On July 21, 2021 EPA announced the Draft Contaminant Candidate List 5 (CCL 5).
- CCL 5 lists drinking water contaminants that are known or anticipated to occur in public water systems and not currently subject to EPA drinking water regulations.
- The Draft CCL 5 includes:
  - 66 individual chemicals
  - 12 microbes
  - 3 chemical groups
    - Per and polyfluoroalkyl substances (PFAS)
    - Cyanotoxins
    - Disinfection By-Products (DBPs)
  - **Note**; PFAS are proposed as a group except for PFOA and PFOS because EPA is moving forward to establish drinking water standards for these two contaminants. <https://www.epa.gov/newsreleases/epa-takes-action-address-pfas-drinking-water>



## EPA CCL 5 - continued

- EPA will consult with the Science Advisory Board (SAB) on the Draft CCL 5 in fall, 2021.
- EPA's public comment on the Draft CCL 5 closed September 17, 2021. For more information see:  
<https://www.epa.gov/ccl/contaminant-candidate-list-5-ccl-5>
- EPA will consider the public comments and SAB feedback in developing the Final CCL 5 which is expected to be published in July, 2022.
- After the Final CCL 5 is published, EPA will begin a separate regulatory determination process to determine whether or not to regulate contaminants from the CCL 5.



# EPA Clean Water Act Section 401 Certification Rule

- On June 2, 2021 EPA announced that it will revise the “Clean Water Act (CWA) Section 401 Certification Rule” (2020 Rule) and begin a series of stakeholder engagements on the upcoming rulemaking effort.
- Executive Order 13990 on “Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis” directed EPA to review and, as appropriate and consistent with applicable law, take action to revise or replace the 2020 Rule. EPA completed this review and determined that it has concerns with the 2020 Rule, including that it is counter to the principles of cooperative federalism and does not reflect the authority of states and tribes to protect their vital water resources under the CWA.
- CWA Section 401 provides authority to states (including territories) and tribes to protect the quality of their waters from adverse impacts resulting from federally licensed or permitted projects. **Under Section 401, a federal agency may not issue or permit to conduct any activity that may result in any discharge into navigable waters unless the affected state or tribe waives certification or issues a CWA section 401 certification finding that the discharge is in compliance with the Clean Water Act and state law.**
- The Federal Register notice is available at <https://www.epa.gov/cwa-401>
- EPA accepted written feedback through a docket for 60 days at **Docket ID EPA-HQ-OW-2021-0302**
- For questions, contact: [cwa401@epa.gov](mailto:cwa401@epa.gov)



# QUESTIONS





**Thanks for joining us!**  
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**SERENA A. DIMAGNO**

Special Environmental Consultant

Direct: 717-610-621-2000 | Cell: 717-379-0084

[Serena.DiMugno@ssmgroup.com](mailto:Serena.DiMugno@ssmgroup.com)

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