



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

Washington, D.C. 20460

WSG# 214

Date Signed: August 10, 2012

OFFICE OF  
GENERAL COUNSEL

AUG 10 2012

**MEMORANDUM**

**SUBJECT:** Renewal of Designation of Regional Councils to Concur in Determinations on State PWS Primacy Revisions under the Safe Drinking Water Act

**FROM:** Scott Fulton  
General Counsel

A handwritten signature in black ink, appearing to read "S. Fulton".

**TO:** Regional Councils  
Regions 1-10

Under Delegation 9-4, the Administrator has delegated to Regional Administrators the authority to act on applications for State primary enforcement for the public water system (PWS) program under the Safe Drinking Water Act (SDWA). That delegation requires that Regional Administrators obtain concurrence from the General Counsel, or his designee, prior to making a final determination.

On August 18, 1992, Acting General Counsel Raymond B. Ludwiszewski designated Regional Councils to act for the General Counsel in approving State PWS primacy revisions, citing then-current Delegation 9-5. That delegation was subsequently revised and renumbered, however, creating some confusion with respect to the 1992 designation. I am hereby renewing this designation of the Regional Councils to concur on behalf of the General Counsel in determinations to approve or disapprove under Delegation 9-4 State PWS primacy revision applications.

An official who redelegates authority does not divest himself of the power to exercise that authority, and an official who redelegates authority may revoke such redelegation at any time.

We remain available to assist you with any legal issues that arise in your review of these applications and trust that you will continue to bring to our attention any State primacy matter that is of national significance.

Attachments: Delegation 9-4  
Memorandum from Raymond B. Ludwiszewski, dated August 19, 1992