

**Water System Restructuring and Assessment Rule  
(WSRAR) Listening Session  
July 17, 2024, 1:00 PM – 3:00 PM EDT**

**Transcript**

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**Prepared for:**

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0:0:9.944 --> 0:0:20.394

Erin Lattimer

Hello everybody and welcome to today's national listening session for the Water System Restructuring Assessment Rule, also known as WSRAR.

0:0:20.884 --> 0:0:22.574

Erin Lattimer

Thank you all for joining us.

0:0:24.154 --> 0:0:31.674

Erin Lattimer

To begin, I would like to let everybody know how to add live captions to today's broadcast.

0:0:33.144 --> 0:0:37.774

Erin Lattimer

So on the slide showing, here are some instructions.

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Erin Lattimer

These captions are available in Spanish and many other languages, so to turn on the captions, follow the instructions first, click the three dots titled more, and then click language and speech and then turn on live captions.

0:0:57.774 --> 0:1:0.814

Erin Lattimer

Once you do that, the captions will appear at the bottom of your screen.

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Erin Lattimer

To change the language, click the gear icon in the top right and then select captions language from the drop down menu.

0:1:13.624 --> 0:1:26.104

Erin Lattimer

If you need any technical support during today's session, please reach out to [carston.kopf@cadmusgroup.com](mailto:carston.kopf@cadmusgroup.com).

0:1:28.674 --> 0:1:31.284

Erin Lattimer

Now I would like to move into introductions.

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Erin Lattimer

My name is Erin Lattimer.

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Erin Lattimer

I'm a contractor for the EPA with the Cadmus Group and I will be facilitating today's listening session and in just a minute, we'll hear from Ed Moriarty, the US EPA branch chief of the Standards and Assessment branch, within the Drinking Water Capacity and Compliance Assistance Division.

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Erin Lattimer

Also online today are Will Bowman, the WSRAR rule manager, and Brandon Wellborn, a member of the WSRAR rule team.

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Erin Lattimer

And next I would like to share the small agenda for today's listening session.

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Erin Lattimer

We will begin with an overview of the WSRAR and then we will transition to the public comment period.

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Erin Lattimer

We'll begin the public comment period from hearing from anybody that has indicated that they want to speak during registration and then we will open it.

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Erin Lattimer

For anyone else that may be interested in speaking, we would like to note that EPA will not be responding to questions during this listening session.

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Erin Lattimer

But if you want your question to be a part of your comment, please go to [regulations.gov](https://www.regulations.gov) or the EPA's WSRAR website to provide a written comment.

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Erin Lattimer

So now I would like to turn it over to Ed Moriarty to provide an overview of the WSRAR and take it away.

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Moriarty, Edward

All right.

0:3:2.984 --> 0:3:8.234

Moriarty, Edward

Thank you very much Erin and first I wanted to say thank you again to everyone who is joining us today.

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Moriarty, Edward

We do appreciate you taking the time to join us.

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Moriarty, Edward

I will be doing an overview of the rule, and we will go ahead, and we will get started.

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Moriarty, Edward

Now next slide please.

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Moriarty, Edward

So AWIA or the American Water Infrastructure Act

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Moriarty, Edward

amended the Safe Drinking Water Act in 2018 to require EPA to issue the Water System Restructuring and Assessment Rule and provide states with new authority to mandate restructuring assessments.

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Moriarty, Edward

Under the Safe Drinking Water - I am -

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Moriarty, Edward

I'm sorry - under the Safe Drinking Water Act, states may mandate assessments for a water system when and, and I'm going to be referring to these later during the presentation as the four criteria, when the water system repeatedly violates the safe drinking water standards in the

national primary drinking water regulations, I'll refer to those as just drinking water regulations, when the water system cannot or will not take feasible affordable actions to comply or it has failed to successfully restructure on its own.

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Moriarty, Edward

States may find that restructuring is feasible.

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Moriarty, Edward

The state may find that restructuring is likely to resolve the water systems compliance challenges, so those are the four criteria.

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Moriarty, Edward

AWIA also amended

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Moriarty, Edward

the Safe Drinking Water Act with regards to the primacy enforcement responsibility or primacy to include a mandatory assessment program.

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Moriarty, Edward

So for that element, what we are saying is that we are requiring that the state does seek primacy and they will have primary enforcement authority for this regulation.

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Moriarty, Edward

When the rule does go final, the states have two years to apply for and to submit an application to get delegation

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Moriarty, Edward

To receive primacy approval plus an additional two year extension if it is necessary, next slide.

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Moriarty, Edward

So what is restructuring?

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Moriarty, Edward

There's no formal regulatory definition of restructuring, so let us talk about what it means under the proposed rule restructuring.

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Moriarty, Edward

Under the proposed rule it means a change in the management, ownership, operations, or physical infrastructure to improve the water system's capacity to provide safe drinking water.

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Moriarty, Edward

And when we talk about providing safe drinking water, we are referring to it being affordable, safe, and we are talking about over a long term.

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Moriarty, Edward

We're not looking for quick fixes here.

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Moriarty, Edward

Its just supposed to be sustainable efforts that are going to be made if they are chosen in practice.

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Moriarty, Edward

A wide range of restructuring types are possible, and this slide identifies some of those, including informal or short term restructuring options such as sharing of operators or equipment, or new treatment technology installation.

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Moriarty, Edward

Some of these could actually also be considered long term, which would include debt restructuring, interconnections with another system, ownership, transfer, or consolidation with another water system.

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Moriarty, Edward

Next slide.

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Moriarty, Edward

So there are three non-binding guiding principles of the Water System Restructuring and Assessment Rule.

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Moriarty, Edward

And I will refer to these as the three principles in short.

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Moriarty, Edward

First one is evaluating restructuring alternatives based on community needs.

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Moriarty, Edward

Consistent with EPA's Water Technical Assistance, or WaterTA, initiative, the main idea is that restructuring should focus on local needs based on a wide range of alternatives.

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Moriarty, Edward

You'll see in these sub bullets here some examples of what we are referring to.

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Moriarty, Edward

So the planning should be focused on the status and needs for that community.

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Moriarty, Edward

So the assessment and later, if there is a restructuring plan, should be customized for that community and that water system.

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Moriarty, Edward

The second principle would be engaging affected communities directly in restructuring decision making.

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Moriarty, Edward

An example of that may include for direct collaborations, such as providing background information such as planning tools and data to show how these resources can be used to make decisions, and again some of these sub bullets provide some more detailed examples.

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Moriarty, Edward

Direct engagement is particularly important when restructuring involves changes to water rates, rate structures, water system consolidation or transfer of ownership.

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Moriarty, Edward

The third principle is to ensure the community capacity to make affordable investments in safe drinking water.

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Moriarty, Edward

And once again, we are talking about sustainability here, long term fixes and these are some examples of some of the programs that are available.

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Moriarty, Edward

All these programs should be discussed as part of the engagement process.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

So the proposed Water System Restructuring and Assessment Rule has 3 regulatory components. There's the mandatory primacy revisions,

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Moriarty, Edward

all states must submit primacy revision applications for a new mandatory restructuring assessment program.

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Moriarty, Edward

In addition, there are reporting and record keeping requirements.

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Moriarty, Edward

Number two, the mandatory assessment requirements for implementation and schedule, an assessment must identify one or more operational managerial or infrastructure changes that will help the assessed water system build its long term capacity to comply with drinking water standards.

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Moriarty, Edward

The assessment also must be tailored, and that is where I refer to being customized, meaning



feasible options identified based on each water system's physical, geographical, and social-economic characteristics.

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Moriarty, Edward

Examples may include population served, sources of drinking water, underserved or disadvantaged status, hydrogeology.

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Moriarty, Edward

The assessment must be performed on a schedule that is consistent with the rule requirements.

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Moriarty, Edward

The third regulatory component would be the eligibility criteria and schedule requirements for restructuring plan incentives, enforcement relief for struggling water systems and liability protection for the compliant water system

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Moriarty, Edward

that's going to partner with the assessed water system.

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Moriarty, Edward

Next slide please.

0:9:59.334 --> 0:10:23.54

Moriarty, Edward

So long term goals of the water system restructuring assessment is a technical, managerial and financial capacity to sustainably provide safe, affordable drinking water and you'll hear me say that again and I already said it previously, given the four drinking water criteria that I described earlier for a state to mandate an assessment focused on struggling water systems.

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Moriarty, Edward

The long term goal of

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Moriarty, Edward

the rule is that the assessed water system will have technical, managerial, and financial capacity

to sustainably provide save affordable drinking water just as the header of this slide says. EPA expects two primary benefits once the rule is fully implemented.

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Moriarty, Edward

First is that the assessed water systems are more likely to identify and implement sustainable restructuring solutions to provide long term safe, affordable drinking water.

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Moriarty, Edward

And the second would be, we expect that the state administrative costs for enforcement will decrease as the more persistently noncompliant water systems are subject to the mandatory assessment and implement those recommendations and come back into compliance.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

So in the Water System Restructuring Assessment Rule, restructuring assessment requirements include the mandatory of the four criteria that I mentioned.

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Moriarty, Edward

And again I will summarize those because I think it is important that people are aware that the water system has repeatedly violated drinking water health standards.

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Moriarty, Edward

The water system cannot or will not take feasible and affordable actions to comply or has tried and failed to restructure on their own.

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Moriarty, Edward

Restructuring is feasible as determined by the state.

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Moriarty, Edward

The state determines that restructuring is likely to resolve the water systems compliance challenges.

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Moriarty, Edward

So again, those are the four criteria. In addition which entities may perform an assessment:

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Moriarty, Edward

These include EPA, the state or an approved third party or a self-assessment by the water system.

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Moriarty, Edward

The tailoring criteria again, I mentioned this and also refer to it as customizing, that the assessor must use the basis for identifying feasible options to achieve safe drinking water.

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Moriarty, Edward

With regards to the assessment report content requirements, those are specified schedule requirements and public engagement requirements, including meetings for the assessment that identify consolidation or ownership, transfer, sharing electronic and paper copies of the assessment with the community, state, and consultation with the assessed water system about next steps.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

Regarding restructuring plan incentives. Incentives and eligibility, the rule includes three safe drinking water incentives to encourage voluntary water system restructuring, the first being that SRF funding and SRF referring to State Revolving Fund - funds for restructuring activities identified in a mandatory assessment.

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Moriarty, Edward

An example of if water system is eligible for SRF funding without submitting a plan, the second being the assessment serves as a mechanism for identifying eligible activities that would fall under SRF and become eligible for those funds.

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Moriarty, Edward

The two other incentives that are in this, the second and third bullet here, are based on and do require restructuring plans.

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Moriarty, Edward

So they are tied directly to those plans.

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Moriarty, Edward

Enforcement relief for up to two years provides an incentive for struggling water systems to restructure liability protection for the compliant water system that partners with a struggling water system.

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Moriarty, Edward

So here we are looking at targeting both the noncompliant water system interested in restructuring with regards to the enforcement relief and then the incentive for the compliant water system, that there would be liability protections for them.

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Moriarty, Edward

There are four restructuring plan types eligible for enforcement, relief, or liability under the Safe Drinking Water Act: physical consolidation, administrative, managerial consolidation, transfer of ownership contracts for administrative or managerial functions of a water system to resolve the compliance issues.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

So we use this table as another way to really summarize those incentives that I just described when comparing the two incentives.

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Moriarty, Edward

And that is the enforcement relief and the liability protection.

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Moriarty, Edward

There are two differences that need to be pointed out.

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Moriarty, Edward

The first important difference is with respect to the state of approval time frames. So you'll see that there's a 12 month time frame for approval of a plan seeking enforcement relief, and that would be for the noncompliant system seeking restructuring and there's an 18 month approval plan schedule for this system

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Moriarty, Edward

who is interested in liability protections.

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Moriarty, Edward

The rule provides additional liability protection time because the process for granting the liability protection based on assets and liabilities, which is a more complicated process to assess and there are additional eligibility requirements for liability protection that just take more time to evaluate.

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Moriarty, Edward

The second important difference is with respect to when the incentives begin.

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Moriarty, Edward

Enforcement relief begins on the date of the state approval before restructuring has started and lasts for two years.

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Moriarty, Edward

Liability protection begins after the state has determined that restructuring is complete, and the term of the liability protection is indefinite with respect to the violations that were identified under that approved plan and those violations were the ones where the water system was granted enforcement relief.

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Moriarty, Edward

For both incentives, the proposed time frames assume that a state could have multiple or make multiple concurrent eligibility determinations, and we will hold public meeting as soon as practicable after the eligibility determinations.

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Moriarty, Edward  
Next slide please.

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Moriarty, Edward  
So this one got a lot of information here.

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Moriarty, Edward  
What I am going to do in the next two slides is talk about examples of a noncompliant system and a system that is a partnering compliant system that is partnering with the noncompliant system.

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Moriarty, Edward  
So first of all, step one state uses Safe Drinking Water Act criteria, and that's the four criteria I described to identify a water system to be assessed.

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Moriarty, Edward  
The state notifies the assessed water system the assessed water system has 30 days to request state approval of either a self-assessment or the intent to use a third party.

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Moriarty, Edward  
The state's going to perform the assessment.

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Moriarty, Edward  
If it does not approve, or if the water system does not respond within 30 days.

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Moriarty, Edward  
State or state approved third party performs mandatory assessment using tailoring criteria.

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Moriarty, Edward  
Feasibility of options is based on physical, technical, and social economic factors.

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Moriarty, Edward  
Those were just three of the items I mentioned that could be considered.

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Moriarty, Edward

State-approved assessor completes the mandatory assessment report, and in that report, they are going to describe how violations at the assessed water system will be resolved,

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Moriarty, Edward

how violation causes will be addressed and how long term TMF – technical, managerial, and financial - capacity will be enhanced,

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Moriarty, Edward

how tailoring criteria were used to identify feasible options,

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Moriarty, Edward

how identified options will ensure access to safe, affordable drinking water, whether consolidation or ownership transfer is feasible for an assessed water system, and if not, why documentation supporting the analysis and the fourth step.

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Moriarty, Edward

The state holds a public meeting and consults with the assessed water system.

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Moriarty, Edward

As I mentioned earlier, electronic and paper copies of the state approved assessment report are shared with the public.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

So this this slide provides an example of the partnering compliant water system under the rule.

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Moriarty, Edward

So the rule includes liability protections that I described earlier or liability incentives for the compliant water system to consolidate with or acquire an assessed water system.

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Moriarty, Edward

If the state approves a restructuring plan and determines that all restructuring is complete, the compliant system is not liable for the assessed water system violations, and they said that the duration of that was indefinite.

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Moriarty, Edward

The compliant water system must use acquired assets of the assessed water system to the maximum extent possible to compensate the state and an example of that would be for, let's say you had a system, a noncompliant system, that had accumulated fines, a value of fines totaling \$100,000 when the compliant water system identified assets to

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Moriarty, Edward

address those fines, they identified \$75,000.

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Moriarty, Edward

And they use that to cover the water system fines.

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Moriarty, Edward

The remaining \$25,000 would be waived. The compliant

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Moriarty, Edward

partnering water system is never liable for the identified violations and does not use its own funds or assets to pay penalties or fines.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

Public engagement requirements for the restructuring plans.

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Moriarty, Edward

With regards to public meetings.



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Moriarty, Edward

The public engagement requirements for the restructuring plans that are one of four eligible types, and I described those earlier, physical, or administrative and managerial consolidation, transfer of ownership contracts for administrative or managerial functions, those are those are the four plan types.

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Moriarty, Edward

The state must make eligibility determination within 60 days of receiving a plan.

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Moriarty, Edward

Then the state would need to hold public meetings as soon as practicable after the eligibility determination.

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Moriarty, Edward

The public meetings would need to meet EPA notice time and location requirements for public meetings to ensure meaningful opportunity for public participation.

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Moriarty, Edward

The state also must make restructuring plans publicly available within 30 days of eligibility determination, the state would need to make electronic copies of plans available to the public on the state's website and paper copies available in one or more public libraries as near as possible to the local community.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

So there are four points to keep in mind regarding the scope of the rule, the first one

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Moriarty, Edward

is community engagement and I just described that the state must hold the public meetings and make reports and plans publicly available.

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Moriarty, Edward

Second is that the assessment must be tailored to the water system characteristics, and I talked about this before.

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Moriarty, Edward

They should be considering physical, technical, social-economic factors that are important when determining feasible options.

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Moriarty, Edward

Third is that the water system restructuring is voluntary, although an assessment is mandatory, restructuring is not mandatory.

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Moriarty, Edward

Finally, states have flexibility.

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Moriarty, Edward

The Safe Drinking Water Act does not establish a regulatory trigger for using the authority,

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Moriarty, Edward

only the four criteria for when the state may mandate an assessment.

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Moriarty, Edward

So in other words, the state may mandate an assessment, not shall mandate, even for struggling water systems.

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Moriarty, Edward

Next slide please.

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Moriarty, Edward

As for public comments, we have some key topics we would like you to consider. Although public comments can address any aspect of the proposed rule, there are four key topics in which the EPA is particularly interested.

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Moriarty, Edward

First is the tailoring criteria.

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Moriarty, Edward

What other water system characteristics should we consider?

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Moriarty, Edward

Second, expand community engagement.

0:23:25.594 --> 0:23:33.684

Moriarty, Edward

Should something like a citizen advisory committee be formed or existing advisory body be identified for direct involvement?

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Moriarty, Edward

How should states and water systems engage community members who cannot participate directly but should be informed periodically?

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Moriarty, Edward

What are the best practices in identifying existing and potential liabilities and assets of struggling water systems?

0:23:54.714 --> 0:24:3.284

Moriarty, Edward

And finally, regarding the eligibility requirements of the restructuring plan, are the deadlines adequate? Are the requirements and limitations of the incentives clear?

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Moriarty, Edward

Next slide please.

0:24:10.844 --> 0:24:18.914

Moriarty, Edward

So on this slide, we are providing you some information with regards to the comment period which ends July 29th, 2024.

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Moriarty, Edward

The public may review and comment on the proposed rule, and this is the link to

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Moriarty, Edward

the area described earlier as well, and that is the docket number for this rule.

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Moriarty, Edward

If you do want more information on the rule, here is a link, and finally, it is our intent to finalize this rule in at the end of 2024.

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Moriarty, Edward

Thank you.

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Erin Lattimer

Thanks, Ed.

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Erin Lattimer

All right.

0:24:50.904 --> 0:24:56.314

Erin Lattimer

So on the next slide, here, we can transition to the public comment period.

0:24:56.804 --> 0:25:10.534

Erin Lattimer

I do want to note that a recording of today's session and a transcript, along with a Spanish translated transcript will be available and posted to EPA WSRAR website.

0:25:13.24 --> 0:25:24.384

Erin Lattimer

So to begin on the screen, here are some guidelines to keep in mind for the public comments, number 1 being, please keep your microphones muted when you are not speaking.

0:25:26.614 --> 0:25:38.814

Erin Lattimer

All listening session comments from today are recorded as part of the docket and in the interest of time we would like to keep today's comments focused on the topic of WSRAR.

0:25:41.944 --> 0:25:51.604

Erin Lattimer

A list of pre-registered speakers is showing on the slide here and we will call on each individual in the order showing.

0:25:52.764 --> 0:26:3.404

Erin Lattimer

So for those of you that are listed here, if you are online and you are ready to provide your comment, please go ahead and use the raise hand function in teams.

0:26:4.864 --> 0:26:9.964

Erin Lattimer

If you have joined via phone, you can press star 5 and that will raise your hand as well.

0:26:11.674 --> 0:26:16.464

Erin Lattimer

When you are called on, we will give you the ability to then unmute your microphone.

0:26:19.264 --> 0:26:27.794

Erin Lattimer

Each speaker will have 5 minutes to present their comments and in just a moment we will pull up a timer in the top right of the screen here.

0:26:27.804 --> 0:26:31.444

Erin Lattimer

So please keep an eye on that timer as you are giving your comments.

0:26:34.234 --> 0:26:45.884

Erin Lattimer

And lastly, after we hear from the pre-registered speakers list, we will open up the chat for anybody else that is online to let us know that you would like to make a comment.

0:26:51.404 --> 0:26:53.514

Erin Lattimer

So I will give folks just another couple seconds.

0:26:53.524 --> 0:26:57.734

Erin Lattimer

Again, if you are online, your name is on the screen, and you are ready to provide a comment.

0:26:57.744 --> 0:26:59.224

Erin Lattimer

Please go ahead and raise your hand.

0:26:59.234 --> 0:27:8.314

Erin Lattimer

This will help us identify you easily with the long list of attendees we have here so that we can give you the ability to unmute your microphone.

0:27:13.904 --> 0:27:14.354

Erin Lattimer

All right.

0:27:15.164 --> 0:27:19.74

Erin Lattimer

So the first speaker we have is Mitch Allen.

0:27:20.164 --> 0:27:26.954

Erin Lattimer

So Mitch, if you are on the line, go ahead and raise your hand and we can unmute you.

0:27:38.844 --> 0:27:42.234

Erin Lattimer

I am not seeing Mitch in the attendee list.

0:27:42.284 --> 0:27:50.414

Erin Lattimer

So Mitch, if you are online under a different name or you called in, please let us know in the chat and we can come back to you.

0:27:53.654 --> 0:27:57.624

Erin Lattimer

So let us move on to Kevin Letterly

0:27:57.634 --> 0:28:2.954

Erin Lattimer

Kevin, we are unmuting your microphone, and you have 5 minutes.

0:28:2.964 --> 0:28:3.454

Erin Lattimer

You may begin.

0:28:4.574 --> 0:28:5.64

Kevin Letterly

Great.

0:28:5.74 --> 0:28:5.984

Kevin Letterly

Thank you so much.

0:28:5.994 --> 0:28:7.504

Kevin Letterly

Erin, can you all hear me alright?

0:28:8.774 --> 0:28:9.924

Erin Lattimer

Yes, we can hear you.

0:28:10.274 --> 0:28:10.794

Kevin Letterly

Awesome.

0:28:10.804 --> 0:28:11.464

Kevin Letterly

Thank you.

0:28:12.234 --> 0:28:23.544

Kevin Letterly

So ASDWA members recognize the importance of consolidation and restructuring, and we support actions that encourage the feasible consolidation and restructuring of water systems.

0:28:24.194 --> 0:28:50.24

Kevin Letterly

We don't feel this proposal addresses many of the barriers that prevent restructuring and to develop a final rule that will better equip states with resources to make water system restructuring progress. ASDWA recommends EPA considers significant engagement strategy with the states between this proposal and the publication of the final rule. Local politics remains one of the biggest restructuring barriers across the United States.

0:28:50.814 --> 0:29:3.704

Kevin Letterly

Community pride and control often analogous with different high school football teams, have been a major hurdle for states to overcome and their own restructuring efforts, even when even when restructuring, would provide the community with superior water.

0:29:4.254 --> 0:29:33.614

Kevin Letterly

This proposal does not address this issue and incentives offered in this proposal will not likely

encourage restructuring, as we recommend, EPA consider additional financial incentives to encourage restructuring in the final rule as well appreciates the flexibility built into this proposal, but would like to strongly emphasize to EPA, the voluntary nature of this regulation, and note that EPA should not question state decisions to use or not use this authority through reviews of any kind.

0:29:34.184 --> 0:29:41.774

Kevin Letterly

The workload associated with this proposal will likely deter many states from utilizing it, and if it is utilized, it will be on rare occurrence.

0:29:42.204 --> 0:29:57.424

Kevin Letterly

Many of the requirements in this proposal for using this authority should be moved to guidelines. We would also like to point out that many states already have successful restructuring programs, and this new authority should not interfere with those programs.

0:29:57.614 --> 0:30:2.444

Kevin Letterly

We look forward to submitting our comments and working with EPA before the final rule is published.

0:30:2.914 --> 0:30:3.964

Kevin Letterly

Thank you so much everyone.

0:30:6.864 --> 0:30:7.634

Erin Lattimer

Thank you, Kevin.

0:30:9.854 --> 0:30:12.804

Erin Lattimer

Next on our list is Lynn Thorpe.

0:30:13.204 --> 0:30:17.4

Erin Lattimer

Lynn, if you are on the line, go ahead and raise your hand.

0:30:17.94 --> 0:30:20.534

Erin Lattimer

Let us know I am looking through the attendee list.



0:30:20.544 --> 0:30:25.874

Erin Lattimer

I do not see your name, but when I give you an opportunity to let us know that you are on the line.

0:30:32.714 --> 0:30:35.304

Erin Lattimer

Lynn we will come back to you in case you are online.

0:30:36.94 --> 0:30:38.344

Erin Lattimer

Next on our list is Kristen.

0:30:38.634 --> 0:30:41.364

Erin Lattimer

I apologize if I pronounce your last name wrong.

0:30:41.374 --> 0:30:42.304

Erin Lattimer

Haitaian.

0:30:42.314 --> 0:30:44.234

Erin Lattimer

Would you like to go ahead and speak?

0:30:44.244 --> 0:30:46.614

Erin Lattimer

We are going to unmute your microphone.

0:30:59.194 --> 0:31:0.534

Erin Lattimer

Go ahead, Kristen, you are unmuted.

0:31:1.304 --> 0:31:1.934

Kristen Haitaian, Freshwater Future

Good afternoon.

0:31:1.944 --> 0:31:3.14

Kristen Haitaian, Freshwater Future

I am Kristen Haitaian.

0:31:3.24 --> 0:31:13.34

Kristen Haitaian, Freshwater Future

I am with Freshwater Future, a Great Lakes based 501C3 that has worked closely with community groups and residents negatively impacted by restructuring.

0:31:13.44 --> 0:31:18.494

Kristen Haitaian, Freshwater Future

Their stories inform our comments on how the EPA can minimize the negative impacts of water system restructuring.

0:31:18.904 --> 0:31:20.804

Kristen Haitaian, Freshwater Future

More detailed written comments will be presented.

0:31:21.824 --> 0:31:23.944

Kristen Haitaian, Freshwater Future

First,

0:31:23.954 --> 0:31:33.264

Kristen Haitaian, Freshwater Future

more protection is needed for the assessed systems governance and oversight. Restructuring should be considered only if there has been a resident vote indicating their approval.

0:31:33.614 --> 0:31:37.884

Kristen Haitaian, Freshwater Future

There must be an agreement for joint oversight with equitable representation.

0:31:38.374 --> 0:31:45.944

Kristen Haitaian, Freshwater Future

Additionally, assessed systems must be compensated for the assets that they have historically paid for and will lose in the restructuring.

0:31:46.154 --> 0:31:51.934

Kristen Haitaian, Freshwater Future

We strongly recommend adding guidance that allows for negotiations of debts within the restructuring process.

0:31:53.804 --> 0:32:3.544

Kristen Haitaian, Freshwater Future

The proposed rule also does not require, at current, a full comprehensive assessment that considers all possible restructuring alternatives.

0:32:4.74 --> 0:32:21.164

Kristen Haitaian, Freshwater Future

The final rule should be amended to add an additional report content requirement to include all

possible scenarios to limit any potential bias, for transparency, due diligence and evidence based decision making assessed utilities and their customers should know how different alternatives compare.

0:32:22.434 --> 0:32:26.764

Kristen Haitaian, Freshwater Future

Another issue is that public engagement requirements are significantly lacking.

0:32:27.214 --> 0:32:36.844

Kristen Haitaian, Freshwater Future

Public meetings should be held, and more than one, earlier in the process and should be required for all potential outcomes, as well as for the evaluation and reporting requirements.

0:32:36.934 --> 0:32:48.474

Kristen Haitaian, Freshwater Future

Specific benchmarks for public engagement need to be added to ensure that an early transparent and equitable process is implemented in every targeted community for health violations.

0:32:48.484 --> 0:32:53.854

Kristen Haitaian, Freshwater Future

While it is critical to address them, the EPA does not say how regional systems will be held to account.

0:32:54.264 --> 0:33:12.774

Kristen Haitaian, Freshwater Future

In other words, if a health violation impacts only a portion of communities within a regional system, consolidation or regionalization will neither be feasible nor effective to ensure safe and affordable Water. The EPA should consider how the rule would impact those systems that have already been combined or acquired.

0:33:14.284 --> 0:33:23.374

Kristen Haitaian, Freshwater Future

Affordability is another concern, as the proposed rule champions affordable outcomes but lacks a definition and guidance for water affordability.

0:33:23.964 --> 0:33:42.714

Kristen Haitaian, Freshwater Future

The EPA should use its existing affordability thresholds for the percentage of annual income spent on water services, as also mentioned in the preamble, there are concerns amongst advocates about privatization and the impact on affordability.

0:33:44.64 --> 0:33:48.724

Kristen Haitaian, Freshwater Future

Private ownership is the single largest factor associated with higher water bills.

0:33:48.964 --> 0:33:57.514

Kristen Haitaian, Freshwater Future

More significant than aging infrastructure or drought. There are two additional guidelines that should be added to protect against this.

0:33:57.824 --> 0:34:11.774

Kristen Haitaian, Freshwater Future

One is that investor owned utilities should not benefit from the proposed liability protection incentives because these private corporations already have enough incentives for acquiring water systems.

0:34:13.84 --> 0:34:21.34

Kristen Haitaian, Freshwater Future

Secondly, more guidelines are needed to address conflicts of interest with potential third party assessors.

0:34:21.544 --> 0:34:27.404

Kristen Haitaian, Freshwater Future

Many private companies engage in both the consulting and the system acquisition business.

0:34:28.964 --> 0:34:42.544

Kristen Haitaian, Freshwater Future

Lastly, some communities are already struggling with affordability, and they may not have a feasible affordable path forward, despite the EPA contending that the assessments would only be mandated if there was an affordable option.

0:34:43.434 --> 0:34:51.724

Kristen Haitaian, Freshwater Future

Benton Harbor, MI, recently chose the most affordable option from a restructuring assessment that was mandated by the EPA.

0:34:52.134 --> 0:35:1.354

Kristen Haitaian, Freshwater Future

It still results in an annual budget deficit, despite being what the community chose and what was going to be most affordable for them.

0:35:1.824 --> 0:35:7.284

Kristen Haitaian, Freshwater Future

The state agency rejected their plan choice and has required an additional restructuring assessment.

0:35:7.704 --> 0:35:14.334

Kristen Haitaian, Freshwater Future

We recommend considering guidelines that address scenarios such as these that can occur in other communities across the nation.

0:35:15.24 --> 0:35:17.434

Kristen Haitaian, Freshwater Future

Thank you for your time and that is all.

0:35:20.494 --> 0:35:21.384

Erin Lattimer

Thank you, Kristen.

0:35:21.394 --> 0:35:22.164

Erin Lattimer

Thanks for your comment.

0:35:24.554 --> 0:35:29.394

Erin Lattimer

Now we will hear from Erma Leaphart.

0:35:29.454 --> 0:35:36.894

Erin Lattimer

Erma, we are giving you the ability to unmute your microphone if you are ready to make a comment, you can unmute yourself.

0:35:38.434 --> 0:35:39.484

Erma Leaphart (Guest)

OK, great.

0:35:39.494 --> 0:35:39.884

Erma Leaphart (Guest)

Thank you.

0:35:41.124 --> 0:35:52.984

Erma Leaphart (Guest)

As my name is Erma Leaphart. I am participating from Detroit, MI and familiar with some of like what happened with Benton Harbor that Kristen just talked about.

0:35:52.994 --> 0:35:55.74

Erma Leaphart (Guest)

And one of the reasons why I am making a comment.

0:35:56.924 --> 0:36:2.574

Erma Leaphart (Guest)

First, I feel that EPA it is really critical for EPA.

0:36:2.584 --> 0:36:9.254

Erma Leaphart (Guest)

I feel to make a clear guidelines as it relates to what affordability is.

0:36:9.264 --> 0:36:10.814

Erma Leaphart (Guest)

I think we use that term -

0:36:11.104 --> 0:36:26.534

Erma Leaphart (Guest)

We're familiar with some percentages of, like annual income of what that means, but I think we need to have a deeper dive on affordability rather than, you know, using it here without the definition. I think it can be confusing.

0:36:26.544 --> 0:36:33.464

Erma Leaphart (Guest)

So please add that and consider even making you know, just making it clear to people what you mean when you say affordability.

0:36:35.684 --> 0:36:57.4

Erma Leaphart (Guest)

My second point would be, I think care needs to be given to the issue around environmental injustice or economic injustice as it relates these water systems, typically that are failing, are in poorer communities or Black and brown communities and perhaps the smaller rural communities.

0:36:57.374 --> 0:37:17.204

Erma Leaphart (Guest)

And often these problems with the systems occur because of past discriminatory practices, racist practices that have led to a lack of resources that result in a failed a failing system or system failing to meet water quality standards.

0:37:17.534 --> 0:37:33.254

Erma Leaphart (Guest)

And I think we need to look at that historical those historical discriminatory practices when we take into account the you know assessment of a system, it is in a way one harm leading to another harm.

0:37:33.674 --> 0:37:48.174

Erma Leaphart (Guest)

You know my community is disenfranchised because of discriminatory practices and now my water system is being, you know, being subjected to the potential of a privatization or some action that we do not want.

0:37:49.824 --> 0:38:0.494

Erma Leaphart (Guest)

My third point would be privatization has not shown itself to be an effective way to either provide safe water or affordable, water.

0:38:1.314 --> 0:38:18.854

Erma Leaphart (Guest)

This may not be all instances, but it is enough that we need to really pause before we include that without some protections, without some restrictions or regulations that restrict what these private operators can and will do.

0:38:20.394 --> 0:38:33.424

Erma Leaphart (Guest)

My fourth point would be, I feel that it is best to approach, or it should be considered an approach to assess a water system and then make it whole.

0:38:33.894 --> 0:39:8.794

Erma Leaphart (Guest)

And what I mean by that is, when the failures are noted or lack of compliance is noted that funds become available and resources and technical advice become available to help that system become whole, to be able to operate in a way that they are in fact providing safe and clean water and that resources going forward would help them to do that, that, that making whole, you know is a vital option.

0:39:9.824 --> 0:39:16.144

Erma Leaphart (Guest)

And my last point would simply be that hearings are great, and they need to be a part of that.

0:39:16.154 --> 0:39:25.54

Erma Leaphart (Guest)

Community voices are important, but also would like to suggest that we also include that in the education.

0:39:26.14 --> 0:39:30.444

Erma Leaphart (Guest)

Or, an educational piece of what is the Safe Drinking Water Act.

0:39:30.454 --> 0:39:31.444

Erma Leaphart (Guest)

How does it work?

0:39:31.454 --> 0:39:32.484

Erma Leaphart (Guest)

What are its features?

0:39:32.494 --> 0:39:33.824

Erma Leaphart (Guest)

What are its protections?

0:39:34.214 --> 0:39:39.574

Erma Leaphart (Guest)

And yes, that we could say that that is the responsibility of a person or a group to do that.

0:39:40.554 --> 0:39:51.774

Erma Leaphart (Guest)

But I think it is OK if the EPA were to take that step and provide, you know, more learning opportunities before engaging with people.

0:39:51.784 --> 0:40:4.964

Erma Leaphart (Guest)

Because you know, I would try to pay attention to what these acts are and what is in them as a water - you know, person interested in water systems and what and water safety etcetera -

0:40:5.664 --> 0:40:7.804

Erma Leaphart (Guest)

it is still complicated.

0:40:7.894 --> 0:40:18.644

Erma Leaphart (Guest)

These laws are complicated, so I think providing the education will help us be better informed when we are providing comment and better informed to terms of understanding the changes.

0:40:19.694 --> 0:40:21.144

Erma Leaphart (Guest)

So thank you.



0:40:21.154 --> 0:40:21.954

Erma Leaphart (Guest)  
Those are my comments.

0:40:23.794 --> 0:40:24.404

Erin Lattimer  
Thank you, Erma.

0:40:26.804 --> 0:40:31.154

Erin Lattimer  
Next on our list of pre-registered speakers is Stephanie Valdez.

0:40:34.174 --> 0:40:36.484

Erin Lattimer  
If you are on the line, go ahead and raise your hand.

0:40:36.494 --> 0:40:37.14

Erin Lattimer  
I am not.

0:40:37.64 --> 0:40:43.244

Erin Lattimer  
I am not seeing the name on the attendee list to be able to unmute you, so please raise your hand.

0:40:50.684 --> 0:40:53.254

Erin Lattimer  
All right, not hearing or seeing anything from Stephanie.

0:40:55.864 --> 0:40:59.264

Erin Lattimer  
Next on our list is Anthony Harvey.

0:40:59.314 --> 0:41:3.614

Erin Lattimer  
Anthony, I see your hand is raised, will enable your microphone.

0:41:4.204 --> 0:41:6.784

Erin Lattimer  
You can unmute yourself and you have 5 minutes.

0:41:6.794 --> 0:41:7.194

Erin Lattimer

You may begin.

0:41:18.724 --> 0:41:21.14

Erin Lattimer

To Anthony, we cannot hear you.

0:41:21.244 --> 0:41:23.194

Erin Lattimer

You're on mute.

0:41:23.204 --> 0:41:24.544

Erin Lattimer

Your microphone is unmuted

0:41:26.524 --> 0:41:27.494

Erin Lattimer

on our end.

0:41:27.504 --> 0:41:30.74

Erin Lattimer

And then if you can unmute so that we can hear your comment.

0:41:37.934 --> 0:41:38.194

Erin Lattimer

OK.

0:41:38.204 --> 0:41:49.964

Erin Lattimer

We'll give Anthony a few more seconds, but while we are waiting for Anthony, one more call for the folks that are on the screen as preregistered speakers.

0:41:50.514 --> 0:41:58.34

Erin Lattimer

Mitch Allen, Lynn Thorp, or Stephanie, if you are on the line and you are ready to make a oh, yes, Anthony, we can hear you.

0:41:54.584 --> 0:41:55.454

Anthony Reid Harvey

I am enabling it now.

0:41:57.454 --> 0:42:0.944

Anthony Reid Harvey

Sorry, I am sorry it took me a while to figure out how to unmute.

0:42:1.414 --> 0:42:2.324

Erin Lattimer

That's OK.

0:42:2.334 --> 0:42:2.994

Erin Lattimer

Please go ahead.

0:42:4.274 --> 0:42:5.604

Anthony Reid Harvey

My name is Anthony Reed

0:42:5.614 --> 0:42:12.44

Anthony Reid Harvey

Harvey, I am a ceramic industrial designer in Niagara Falls, NY, focused on environmental health.

0:42:12.634 --> 0:42:29.124

Anthony Reid Harvey

What I am talking about here is water filter systems of packed particle beds, PPBs for microbial reduction. Large scale PB water filters could get safe drinking water to more of those in need than what is otherwise possible.

0:42:30.24 --> 0:42:31.994

Anthony Reid Harvey

There are two kinds of PPB filters.

0:42:32.4 --> 0:42:46.794

Anthony Reid Harvey

Those of granulated ceramic filter media and those of glass microbeads both are treated with a tiny amount of silver for the oleo dynamic, essentially destroying microbes.

0:42:47.324 --> 0:42:54.434

Anthony Reid Harvey

Both have the advantage that they can be produced at low cost almost anywhere depending on economic context.

0:42:54.504 --> 0:43:4.434

Anthony Reid Harvey

Communities of low income or those of middle and high income for some 43 million Americans who do not have access to municipal water treatment.

0:43:4.764 --> 0:43:9.484

Anthony Reid Harvey

PPB water filter systems could be tailored to the size of their communities.

0:43:10.634 --> 0:43:16.124

Anthony Reid Harvey

Both PPB and filter media are nature based in that they depend on gravity only.

0:43:16.174 --> 0:43:33.594

Anthony Reid Harvey

Given the input of clear water, water filter, media of glass microbeads is the contribution of Professor William Lacourse of Alfred University's New York State College of Ceramics, in municipal water treatment.

0:43:33.604 --> 0:43:51.724

Anthony Reid Harvey

Regardless of location, PPB filter media could substitute for slow sand treatment with little or no subsequent need of disinfection by ultraviolet or reverse osmosis for the developing world, the future of water treatment could be in large scale point of use.

0:43:51.734 --> 0:44:3.254

Anthony Reid Harvey

PPB water filters systems could get safe drinking water to more of those who are vulnerable than what is otherwise possible in low income communities.

0:44:3.494 --> 0:44:9.24

Anthony Reid Harvey

These filters systems should be a short walk from homes in middle income communities.

0:44:9.34 --> 0:44:10.994

Anthony Reid Harvey

The water may be piped to homes.

0:44:12.364 --> 0:44:21.594

Anthony Reid Harvey

There's more description much the same as what I submitted at several links.

0:44:21.764 --> 0:44:24.674

Anthony Reid Harvey

Otherwise bye for now, and thanks to all for the good work.

0:44:27.594 --> 0:44:28.984

Erin Lattimer

Thank you for your comment.

0:44:29.514 --> 0:44:34.684

Erin Lattimer

As a reminder, we would like to keep today's focus on the Water System Restructuring Assessment Rule.

0:44:34.814 --> 0:44:43.164

Erin Lattimer

If you have other concerns or questions, I encourage you to submit them in writing to the public docket or contact the appropriate department outside of this session.

0:44:44.984 --> 0:44:47.554

Erin Lattimer

So let us proceed with the next speaker.

0:44:47.564 --> 0:44:56.724

Erin Lattimer

I do just want to double check that Mitch Allen, Lynn Thorp, or Stephanie, if you are on the line and would like to make a comment, please go ahead, and raise your hand.

0:45:6.824 --> 0:45:6.994

Erin Lattimer

All.

0:45:7.74 --> 0:45:12.584

Erin Lattimer

Hey, well, that is all of our pre-registered speakers for today's session.

0:45:12.594 --> 0:45:17.684

Erin Lattimer

We would like to open it up to anybody else that may be interested in providing a verbal comment.

0:45:19.94 --> 0:45:26.34

Erin Lattimer

Please let us know in the chat if you would like to speak and we will call on you in the order of your messages.

0:45:27.894 --> 0:45:36.664

Erin Lattimer

I would also like to remind folks that a recording and transcript of today's session will be available and posted to EPA's WSRAR website.

0:45:37.794 --> 0:45:44.704

Erin Lattimer

And if you would like to submit a written comment, please visit [regulations.gov](https://www.regulations.gov) or the EPA WSRAR website.

0:45:48.224 --> 0:45:51.214

Erin Lattimer

So again, I will give folks a few minutes here.

0:45:51.444 --> 0:45:53.874

Erin Lattimer

Go ahead and send us a message in the chat.

0:45:54.624 --> 0:45:58.954

Erin Lattimer

You can also raise your hand to let us know that you would like to make a verbal comment.

0:46:21.164 --> 0:46:21.774

Erin Lattimer

All right.

0:46:21.824 --> 0:46:24.34

Erin Lattimer

I see our first message.

0:46:24.984 --> 0:46:29.744

Erin Lattimer

I think these came in at the same time, so we will start with Mark, Mark Mayer.

0:46:29.994 --> 0:46:35.854

Erin Lattimer

We'll go ahead and enable your microphone and then you can unmute yourself.

0:46:35.864 --> 0:46:39.4

Erin Lattimer

Provide your comment and you have 5 minutes Mark.

0:46:43.804 --> 0:46:44.384

Mayer, Mark

Thanks.

0:46:45.344 --> 0:46:48.704

Mayer, Mark

Just wanted to ask a question to make sure I understood this correctly.

0:46:51.74 --> 0:46:55.264

Mayer, Mark

So every state is going to be required to

0:46:57.634 --> 0:47:0.804

Mayer, Mark

adopt this rule and seek primacy for it.

0:47:0.864 --> 0:47:1.154

Mayer, Mark

It is not

0:47:3.204 --> 0:47:4.194

Mayer, Mark

voluntary.

0:47:4.524 --> 0:47:23.554

Mayer, Mark

For instance, if we already have effective programs for restructuring and we do not see a benefit from this rule for our systems in our state, are we still required to adopt this rule that and seek primacy?

0:47:27.614 --> 0:47:29.324

Erin Lattimer

Thanks for your question, mark.

0:47:29.414 --> 0:47:34.504

Erin Lattimer

I would like to note, EPA cannot respond to questions during today's listening session.

0:47:34.514 --> 0:47:39.134

Erin Lattimer

But your question and comment will be part of the docket.

0:47:34.854 --> 0:47:35.324

Mayer, Mark

I got you.

0:47:39.694 --> 0:47:40.784

Erin Lattimer

So thank you for your comment.

0:47:40.264 --> 0:47:51.844

Mayer, Mark

Well, maybe I will restructure my question into a comment and if it is meant to be mandatory, to adopt this voluntary

0:47:53.884 --> 0:47:55.874

Mayer, Mark

Flexible,

0:47:57.264 --> 0:48:9.634

Mayer, Mark

restructuring rule. I think it should be voluntary for the state to adopt it if we feel it would be beneficial, and not adopt it if we do not need it.

0:48:10.714 --> 0:48:11.74

Mayer, Mark

Thank you.

0:48:12.844 --> 0:48:13.824

Erin Lattimer

Thank you for your comment.

0:48:16.384 --> 0:48:19.614

Erin Lattimer

It looks like Heidi W would like to make a comment.

0:48:19.624 --> 0:48:27.74

Erin Lattimer

Heidi, we will unmute or enable you the ability to unmute your microphone and when you are ready, you can get started.

0:48:27.84 --> 0:48:27.894

Erin Lattimer

You have 5 minutes.

0:48:33.924 --> 0:48:34.574

Heidi W.

Yeah.



0:48:34.584 --> 0:48:37.484

Heidi W.

Hello I do not have very much to say except that.

0:48:45.184 --> 0:49:7.424

Heidi W.

And I guess my -- and you cannot answer questions right now, but I wonder, and, I suppose I encourage EPA to coordinate potentially with congressional liaison, because I know that the statutes also have.

0:49:7.874 --> 0:49:29.4

Heidi W.

So wherever you think that the statute dictates, a rule must be made for this rule, I guess maybe transmitting the comments that are made here and by others through congressional liaison, because it sounds like some of the issues are with the statute more than the rule.

0:49:33.104 --> 0:49:34.304

Heidi W.

That's all. Thanks.

0:49:35.904 --> 0:49:36.554

Erin Lattimer

Thank you, Heidi.

0:49:39.204 --> 0:49:40.874

Erin Lattimer

I see another hand just went up.

0:49:40.884 --> 0:49:42.214

Erin Lattimer

Maggie Neal.

0:49:42.264 --> 0:49:50.184

Erin Lattimer

Maggie, we will enable your microphone, give you the ability to unmute, and when you are ready, you have 5 minutes.

0:49:51.144 --> 0:49:51.754

Maggie M. Neal

Thank you.

0:49:51.804 --> 0:50:40.324

Maggie M. Neal

I would hope that in reviewing the timelines, that consideration would be taken to length of time and funding needed to acquire audits, to make them potentially viable for acquiring any state or federal loans that might be available and to provide guidance to the states for feasible work arounds in order to meet this specific requirement and timeline, because many of our small tiny rule systems that are in these in the predicament that would lead them to possibly being restructured do not have audits, do not have financial viability, would require grants or heavy,

0:50:42.34 --> 0:50:44.384

Maggie M. Neal

I cannot remember the term right now,

0:50:44.394 --> 0:50:47.364

Maggie M. Neal

I apologize where it is a loan forgiveness.

0:50:47.824 --> 0:51:17.214

Maggie M. Neal

And so if they don't have any of the financial viability to restructure and any of their neighboring systems are in the same boat, they may not be able to have anybody take them over or provide further guidance or even have shared management because a lot of in Kentucky, where I'm at, we are heavily consolidated and many of our small systems are neighboring to other small systems that are in very similar boats.

0:51:17.224 --> 0:51:26.354

Maggie M. Neal

And so I just hope that that consideration would be taken as to process and timeline that affects financial.

0:51:27.304 --> 0:51:28.254

Maggie M. Neal

Yeah.

0:51:28.264 --> 0:51:31.534

Maggie M. Neal

Acquiring loans and that the states would have the guidance as well.

0:51:31.544 --> 0:51:33.694

Maggie M. Neal

So it would not be just developing this rule.

0:51:33.704 --> 0:51:39.244

Maggie M. Neal

It would also be developing any other guidance or rules that would go with or would touch this rule.

0:51:40.114 --> 0:51:40.514

Maggie M. Neal

Thank you.

0:51:43.24 --> 0:51:44.354

Erin Lattimer

Thank you for your comment, Maggie.

0:51:48.904 --> 0:51:54.4

Erin Lattimer

As a reminder, let us know in the chat or raise your hand if you would like to make a comment.

0:52:9.744 --> 0:52:10.694

Erin Lattimer

All right, Laura.

0:52:10.704 --> 0:52:12.334

Erin Lattimer

I see your hand is raised.

0:52:12.344 --> 0:52:15.614

Erin Lattimer

We will enable your microphone and give you the ability to unmute.

0:52:19.184 --> 0:52:22.174

Erin Lattimer

Or if you are online, you can unmute yourself.

0:52:31.674 --> 0:52:34.224

Erin Lattimer

Laura, I do not know if it was an accidental hand raised.

0:52:35.14 --> 0:52:36.384

Erin Lattimer

We just enabled your microphone.

0:52:36.394 --> 0:52:38.544

Erin Lattimer

I saw your hand went down so.

0:52:40.374 --> 0:52:42.464

Erin Lattimer

If you would like to make a comment, you can unmute.

0:52:53.654 --> 0:52:54.234

Erin Lattimer

All right.

0:52:54.304 --> 0:52:57.714

Erin Lattimer

Is there anybody else on the line that would like to make a comment?

0:52:57.724 --> 0:53:1.844

Erin Lattimer

Please let us know you can send a message in the chat, or you can raise your hand.

0:53:18.384 --> 0:53:23.694

Erin Lattimer

I am not seeing anything on my end, so I do want to give folks maybe another 30 seconds or so.

0:54:12.484 --> 0:54:13.14

Erin Lattimer

All right.

0:54:13.24 --> 0:54:20.454

Erin Lattimer

I am not seeing any more hands or comments in the chat for anybody that would like to make a comment, so we can wrap up today's session.

0:54:20.464 --> 0:54:22.654

Erin Lattimer

We have one more slide here that we would like to share.

0:54:24.884 --> 0:54:29.334

Erin Lattimer

I want to remind everyone that the docket will close on July 29th.

0:54:29.844 --> 0:54:34.214

Erin Lattimer

All comments made during today's listening session will be part of the docket.

0:54:36.314 --> 0:54:47.184

Erin Lattimer

A recording and transcript of today's session, including a Spanish translation transcript, will be available in posted to the EPA WSRAR website.

0:54:49.344 --> 0:54:52.554

Erin Lattimer

And we have another listening session on July 24th.

0:54:52.564 --> 0:55:0.374

Erin Lattimer

If anybody would like to make a verbal comment, thank you all for your thoughtful input and participation.

0:55:0.384 --> 0:55:5.954

Erin Lattimer

Today, your engagement is crucial in shaping effective and equitable water policies.

0:55:7.144 --> 0:55:9.14

Erin Lattimer

To thank you, everybody, have a great day.