

CLEAN WATER ADVOCATE

DC Water's General Manager, George Hawkins (pictured), will join Ken Rubin, Managing Director with Rubin Malloys Worldwide, for the keynote address at NACWA's 2014 Summer Conference & 44th Annual Meeting, Executive Utility Leadership . . . Today & Tomorrow, in July.



A Clear Commitment to America's Waters



APRIL/MAY 2014

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WRRDA Signed Into Law, Overhauls Clean Water SRF in Line with Utility of the Future Priorities

Following passage in both the House of Representatives and Senate, President Obama signed the *Water Resources Reform & Development Act (WRRDA)* into law on June 10. The legislation, which reauthorizes flood control projects around the country, includes a major overhaul to the Clean Water State Revolving Fund (CWSRF) program. The changes to the CWSRF were the result of intense advocacy by NACWA and the Water Infrastructure Network (WIN), urging Congress to demonstrate its commitment to the CWSRF as a core investment tool for municipal wastewater agencies.

Change in Loan Repayment Offers Benefits to Utilities Nationwide

Modifications to the CWSRF include: 1) extending the CWSRF loan repayment period to up to 30 years; 2) codifying additional subsidization provisions enabling economically distressed communities to receive more affordable financing; 3) incentivizing investments in energy efficiency, water efficiency and reuse; 4) incentivizing partnerships between municipal wastewater utilities and upstream property owners to collaboratively tackle non-point source pollution and improve water quality; and, 5) incentivizing wastewater utilities to undertake practices to ensure increased resiliency against man-made and/or natural disasters.

These changes are very much aligned with the Association's collaborative *Water Resources Utility of the Future (UOTF)* initiative – recognizing the changing wastewater sector landscape and encourage greater investment in more sustainable infrastructure to help communities better – and more affordably – manage their clean water needs. The new CWSRF provisions also mirror many of the ideas NACWA is proposing in its *Technology Innovation & Resource Recovery Fund (TIRRF)* legislative proposal, which expands

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Utility Leaders “Telling the Modern Utility’s Story” to Headline Conference

A keynote address featuring a new NACWA paper, *Telling the Modern Utility’s Story*, will focus on the contributions clean water utilities make to the social, economic and environmental well-being of their communities will kick-off the Association’s 2014 Summer Conference & 44th Annual Meeting in Portland, Oregon, July 13-16. Continuing the ongoing dialogue from recent NACWA conferences, clean water agency leaders from across the country will gather in Portland this July to discuss Executive Utility Leadership...Today & Tomorrow.

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Integrated Planning Gets a Boost from EPA

NACWA has been urging the U.S. Environmental Protection Agency (EPA) and Congress to support communities in their desire to advantage of integrated planning by providing a financial and technical assistance. Additional examples of successful use of integrated planning could lead to a sought after a tipping point, making it a major pathway toward compliance.

The Association was pleased to work with a bi-partisan group of [House](#) and [Senate](#) Members of Congress who pledged to work together to secure funding in EPA's FY15 budget and was doubly pleased that the Agency has come forward to [pledge the availability of \\$335,000](#) in technical assistance for up to five communities to develop and implement an integrated plan. In its notice of fund availability, EPA indicated that if more money can be found, more communities can be helped.

Spokane Plan Offers Glimpse at the Future

Since June 2012 when EPA rolled-out the [Framework for an Integrated Municipal Stormwater and Wastewater Planning Approach](#), NACWA has been a primary advocate for helping communities take advantage of the initiative. The approach offers considerable potential to help communities more flexibly – and therefore more affordably – meet compliance obligations under the Clean Water Act (CWA), especially those relating to wet weather management. To date, NACWA has organized workshops in seven EPA regions for Association members to learn

about integrated planning from the key EPA staff and from State water quality administrators who both play important roles in its implementation. Numerous presentations and discussions have also taken place at NACWA conferences.

Integrated planning, so far, has primarily been used as a tool by communities in the process of negotiating consent decrees – and not by those working on permit renewal through the normal NPDES process. Integrated planning, however, has the potential to become a standard operating approach for managing CWA compliance obligations – and be used to negotiate NPDES permit renewals outside an enforcement proceeding. In doing so, communities could achieve better environmental outcomes at more affordable costs for ratepayers. A recent example is Spokane, Washington, which last month announced its [Integrated Clean Water Plan](#) that will save ratepayers nearly \$150 million and lead to better environmental outcomes for the community at-large.

The question remains, however, whether Spokane will remain an outlier or a leading indicator of a trend toward a greater adoption of the integrated planning approach. NACWA is working hard to ensure that Spokane is a trend-setter by finding the resources to support more communities in their efforts to embrace integrated planning and provide better environmental outcomes for their ratepayers. 💧

NACWA Index Released, Service Charge Increases Again Outpace Inflation

NACWA's 2013 [Cost of Clean Index](#) is now available. For the twelfth straight year the increase in the average cost of wastewater services for a single-family residence has outpaced the rate of inflation, as measured by the Consumer Price Index (CPI). In fact, the average cost of wastewater services rose 5.5 percent in 2013, more than triple the rate of inflation over the same period. The national average annual cost for a single family residence is now \$435.

Charges Projected to Reach \$500 by 2016

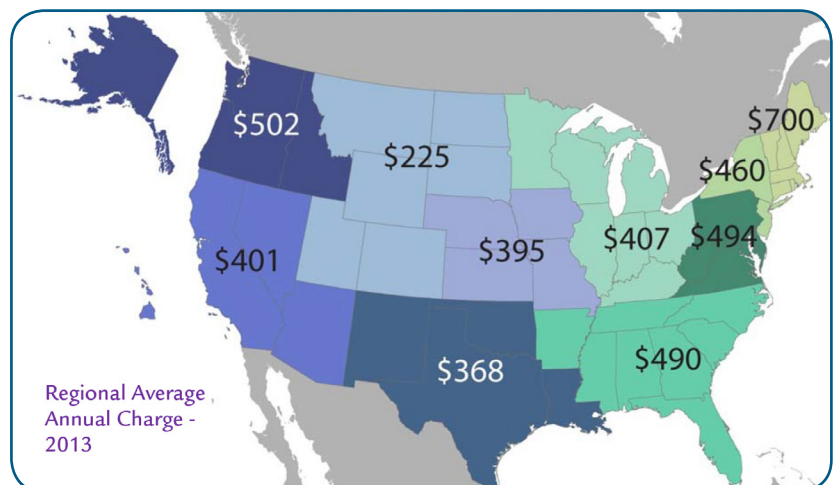
The results from the *NACWA Index* survey continue to indicate a steady rise in the average service charge, with projections showing an increase of about 5 percent per year over the next five years. Average annual charges are expected to top \$500 by 2016 and \$568 by 2018.

Regional Data Provide More Complete Picture

Regional level data, which better account for the cost of living and other variables, often provide more accurate benchmarks for utility managers. The minimum and maximum values from each of the ten U.S. Environmental Protection Agency (EPA) regions provide the range of values that make up the national average annual service charge of \$435, with

average annual charges ranging from a low of \$225 in EPA Region 8, to a high of \$700 in EPA Region 1.

NACWA has published the *Cost of Clean Water Index* (formerly the *Service Charge Index*) annually since 1986. 💧



NACWA, AMWA Host Water Resilience Summit During Water Week 2014

More than 50 wastewater utility, drinking water utility, private sector, and federal officials came together during *Water Week 2014* for a day-and-a-half facilitated dialogue on climate and resilience issues. The *Water Resilience Summit*, convened by the NACWA and the Association of Metropolitan Water Agencies (AMWA), focused on the need for federal-municipal cooperation to build water sector resilience – and featured representatives from an array of federal agencies, including the U.S. Environmental Protection Agency (EPA), the Federal Emergency Management Agency (FEMA), the Department of Interior (DOI), the Department of Energy (DOE), the White House's Council on Environmental Quality (CEQ), and the U.S. Army Corps of Engineers.

EPA Administrator Gina McCarthy provided a keynote address at the Summit stating that “...we are spending time on resilience because the 100 year storm is now more like the 100 week storm. Municipalities are developing different strategies to deal with these issues and asking how can EPA bring solutions to you?” McCarthy also touted the great work utilities are doing to embrace the NACWA/Water Environment Federation (WEF)/Water Environment Research Foundation (WERF) Water Resources Utility of the Future (UOTF) initiative and how it is helping our cities become more resilient.

Following the Summit, the CEQ met with NACWA staff and a member utility representative to outline possible partnerships on key advocacy issues under the UOTF portfolio, including water reuse. The Association briefed staff from CEQ's Land and Water divisions on the collaborative UOTF initiative, including efforts to promote resource recovery, energy generation and water reuse. CEQ discussed its interest in UOTF issues, especially water reuse which relates to their work with



U.S. Environmental Protection Agency Administrator, Gina McCarthy provides the keynote address of the Water Resilience Summit while NACWA Board Member and Chief Engineer for the Boston Water & Sewer Commission, Mass. looks on.

the National Drought Resilience Partnership (NDRP), an interagency effort to make it easier to access Federal drought resources by linking relevant information with drought resilience strategies.

NACWA will continue to engage CEQ and the White House on UOTF and reuse efforts, exploring possible partnerships and support statements on resilience-related issues in the coming months. A white paper will be released this summer summarizing the Summit's discussions and outlining collaborative next steps. 💧

Summer Conference CONTINUED FROM PAGE 1

Utility leaders – in their communication with ratepayers, elected officials and other stakeholders – are embracing their role as managers of key resources and focusing their sights on the economic, environmental and social value they provide to their communities, and the nation. NACWA has embarked on a new effort to describe and assist today's clean water utilities communicate these triple bottom line contributions. Ken Rubin, Managing Director for Rubin Malloys Worldwide, the paper's author, will kick off the keynote address, and be joined by George Hawkins, General Manager for DC Water, who will provide a first-hand account of how 'telling the story' of your utility and its contributions can reap benefits on multiple fronts.

Sessions to Focus on Challenges, Opportunities Facing Utility Executives

The Summer Conference's focus on executive utility leadership will showcase how today's leaders are working to craft a new story for their utilities. Featured speakers will provide perspectives on

how the transformation in utility operations – to embrace an array of recoverable resources – will necessitate changes in management and leadership. Finding the right mix of public and private engagement and investment continues to be a hot topic, and conference participants will hear insights gained from an important dialogue between public and private leaders in June. The connection between water and economic growth and jobs has never been stronger and a roundtable discussion will explore the issue further with perspectives from utility managers, as well as the labor and environmental communities.

The conference will include a Saturday, July 12, *Rock the Current* 5K Run/Walk at Gov. Tom McCall Waterfront Park benefitting Water for People Portland. Three post-conference tours will feature the innovative work NACWA's members are doing in and around Portland. Registration and the conference agenda are now available. Additional information including an agenda and registration is available on the NACWA [website](#). 💧

Inaugural Water Week Brings Hundreds to DC

NACWA, the Water Environment Federation (WEF) and the Water Environment Research Foundation (WERF) – along with the Association of Metropolitan Water Agencies (AMWA), the U.S. Water Alliance, and a number of state and regional water groups – banded together to bring hundreds of clean water professionals from coast-to-coast to Washington, DC to advance shared priorities as part of *Water Week 2014*. The anchor event of Water Week was the two and a half day *National Water Policy Forum & Fly-In*. NACWA, WEF, and WERF collaborated to craft a compelling Forum agenda that included an array of clean water advocacy, technical policies, communications, and research priorities – demonstrating the power of the water sector when it speaks with one voice.

The *Forum & Fly-In* featured Members of Congress and leading policymakers from the U.S. Environmental Protection Agency (EPA), other federal agencies, and key stakeholders – including the U.S. Conference of Mayors (USCM) – each providing key perspectives on clean water and environmental priorities. Sector leaders heard from Senator Sheldon Whitehouse (D-RI) who discussed the vital importance of continued federal clean water funding for Rhode Island and the nation, and from Rep. Bob Latta (R-OH) who has sponsored the important *Clean Water Affordability Act* and discussed the difficulty in Ohio of raising rates on households who are seeing their median incomes decline. Both Senator Whitehouse and Representative Latta were recipients of NACWA's *National Environmental Achievement Awards* recognizing their public service.



Senator Sheldon Whitehouse (D-RI) illustrates the vital importance of continued federal clean water funding for Rhode Island, and the nation, while accepting NACWA's National Environmental Achievement Award recognizing his public service.

Representative Bob Gibbs (R-OH), Chair of the House Water Resources & Environment Subcommittee, provided remarks at the *Water Week 2014 Congressional Reception* overlooking the Capitol dome. Representative Gibbs was joined by Representatives Bishop, Donna Edwards (D-MD), Steve Chabot (R-OH), and Jim Moran (D-VA) at the reception, exemplifying the value of the water sector organizations joining forces and building key relationships on Capitol Hill.

Throughout the week representatives from clean water and drinking water utilities across the country carpeted Capitol Hill – putting national priorities in a local context for their Congressional delegations. Funding and investment; climate resiliency; affordability; and, integrated planning were among the issues discussed in detail at Capitol Hill meetings.

The *Policy Forum & Fly-In* also featured presentations from EPA leaders, including Deputy Administrator Bob Perciasepe, who underscored the importance of the Agency's work on integrated planning and affordability – as well as the need for a focus on resilience. Nancy Stoner, EPA's Acting Assistant Administrator for Water, touted NACWA's support for the recently released proposed rule on Clean Water Act jurisdiction. Stoner also discussed EPA's view of the 8th Circuit Decision on blending and announced a planned public health forum to explore the health impacts of blending.

Congressional Clean Water Caucus Briefing Features Sector Leaders Representative John Duncan (R-TN) and Tim Bishop (D-NY), Co-Chairs of the Congressional Clean Water Caucus, provided remarks during the Caucus's first Capitol Hill briefing, *Utilities of the Future ... Engaging Communities, Embracing New Challenges & Ensuring Economic Priorities*. The briefing featured presentations by Harlan Kelly, General Manager of the City & County of San Francisco Public Utilities Commission; James 'Tony' Parrott, Executive Director of the Metropolitan Sewer District of Greater Cincinnati; David St. Pierre, Executive Director of the Metropolitan Water Reclamation District of Greater Chicago; Matt Millea, Deputy County Executive of the Onondaga County Department of Water Environment Protection; and, Jo Ann Macrina, Commissioner City of Atlanta Department of Watershed Management. Each described their agency's future-focused initiatives and underscored the importance of the federal government being a full partner with municipalities in innovative approaches and supporting advanced technologies to meet 21st century challenges. The Caucus is planning an additional two Congressional briefings on Utility of the Future issues throughout the year.

Dates Announced for Water Week 2015

Dates were recently announced for the next *Water Week* – April 12-18, 2015. The NACWA/WEF/WERF *Policy Forum & Fly-In* will take place Monday – Wednesday, April 13-15. Joining the organizations as an early partner in Water Week 2015 is the Water & Wastewater Equipment Manufacturers. Utilities nationwide should plan now to attend. 🌊




WRRDA CONTINUED FROM PAGE 1

a carve-out in the CWSRF to the suite of UOTF-related innovative technologies, in addition to green infrastructure and energy efficiency. WRRDA's embrace of these concepts eliminates the need for TIRRF proceeding as a separate proposal.

WIFIA Established as Pilot Program

The WRRDA bill also includes a new investment tool for drinking water and wastewater infrastructure projects known as the *Water Infrastructure Finance & Innovation Authority* (WIFIA). WIFIA establishes a five-year, pilot program allowing the U.S. Environmental Protection Agency (EPA) to provide direct loans and loan guarantees to drinking water and wastewater infrastructure projects that cost at least \$20 million (or \$5 million for water systems serving 25,000 or

fewer people). This pilot program would be separate from the SRF programs, though State SRF programs can access these funds. The Army Corps of Engineers has the authority to also provide loans and loan guarantees for projects for flood damage reduction, restoration of aquatic ecosystems, improvements to inland and intracoastal waterway navigation systems as a separate program from that which EPA will administer.

NACWA will stay engaged with EPA and State Revolving Fund administrations as they work to implement these new policies. 

Springtime Active in Regulatory Arena

Calendar year 2014 started fast on the regulatory front and the spring months have been no exception. In recent months NACWA filed comments on the U.S. Environmental Protection Agency's (EPA) proposed *Greenhouse Gas Inventory* and the Idaho Department of Environmental Quality (IDEQ)'s human health water quality criteria. NACWA, and representatives from member agencies, also participated in the first meeting of the Flushability Technical Workgroup.

Revisions to Greenhouse Gas Inventory Recommended

NACWA submitted [comments](#) to EPA in late March on the Agency's draft *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2012* (*Inventory*). In its comments, the Association asked for further clarification and recommended that the Inventory not be used for regulatory requirements. The annual inventory provides nationwide estimates of greenhouse gas (GHG) emissions for various sectors, including wastewater treatment, and is intended to be used only for informational purposes. The wastewater treatment category in the *Inventory* includes publicly owned treatment works (POTWs), septic systems, and industrial wastewater treatment systems, and consistently ranks in the top ten sectors for emissions of methane and nitrous oxide, although wastewater emissions are much smaller in magnitude than for the highest ranked categories.

NACWA has commented on the seven previous *Inventories*, and EPA has made corrections and clarifications that have been requested by the Association. In this year's *Inventory*, EPA responded to a request made by NACWA last year and included more information about the variables used in calculating nitrous oxide emissions for 2012 and previous years. The Agency did not make any substantive changes in the emissions calculations in this year's *Inventory*, prompting NACWA to reiterate its comments from previous years. The Association recommended that EPA use a different methodology or a different nitrogen loading rate to calculate nitrous oxide emissions, since loading rates, collected by NACWA and available in literature, are lower than those used in the *Inventory*. NACWA also asked EPA to clarify that the *Inventory* should

not be used for regulatory requirements, since industry-wide estimates are not always applicable for facility-level emissions calculations, such as those required in Clean Air Act permitting programs. The Association will evaluate any changes made in the final 2012 *Inventory* and will continue to monitor all EPA actions related to GHG emissions from wastewater utilities.

Idaho Human Health Criteria Effort Could Set Precedent

NACWA provided [comments](#) on April 23 to the Idaho Department of Environmental Quality (IDEQ) on the state's ongoing negotiated rule-making process to evaluate fish consumption rates and the overall protectiveness of Idaho's human health water quality criteria. Water quality criteria to protect human health are generally developed to ensure that fish and shellfish can be safely eaten by humans.

Several states, including Washington, Florida and Idaho, are currently looking at whether their existing human health criteria are adequately protective, with particular focus on the assumed amounts of fish that humans eat. In Idaho, the state has initiated a negotiated rulemaking to allow for an open and transparent process in which stakeholders can actively participate. One of the approaches Idaho is considering is the use of Probabilistic Risk Assessment (PRA) in lieu of the current deterministic approach for establishing criteria for toxic pollutants. Idaho's adoption of PRA could set a precedent for other states. PRA, in lieu of using a single value for each of the parameters in the risk calculation, uses a distribution of parameter values and provides a resulting distribution of risk, allowing for more refined and informed calculations. NACWA's letter noted that PRA is a technically-sound approach that represents the best science available for assessing risk – and that it represents a significant technical advance that other states should consider. PRA does not, however, solve all of the issues associated with criteria development, and the Association's letter stressed that rational implementation policies and tools will still be needed.

The Association continues to work with its members in states where

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NACWA Releases New Advocacy Tools on Enforcement Issues

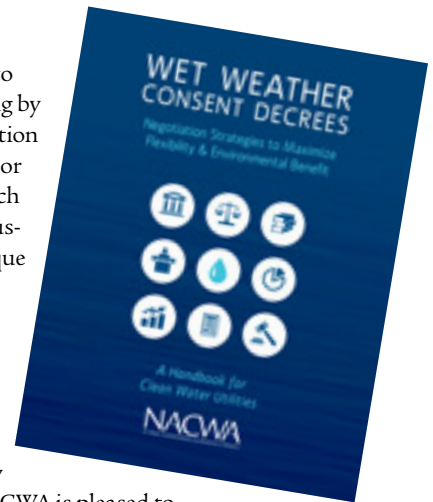
In May, NACWA released two new powerful advocacy tools to assist utilities nationwide with issues associated with wet weather enforcement. The Association's updated and enhanced handbook, [Wet Weather Consent Decrees: Negotiation Strategies to Maximize Flexibility & Environmental Benefit](#), and online [Consent Decree e-Library](#) will provide NACWA members with cutting-edge information, analysis, and strategies on significant wet weather enforcement issues including negotiation, renegotiation, implementation, and modification of enforcement orders and decrees.

The new handbook will serve as the premier tool for the municipal clean water community when addressing wet weather enforcement issues, and includes an examination of key provisions from existing municipal orders, along with a thorough analysis and explanation of the major regulatory and legal documents that will form the framework of enforcement discussions. The handbook also includes a number of new sections on the mechanics of wet weather enforcement and how to leverage tools like integrated planning to negotiate the best enforcement order.

To accompany the handbook, NACWA has completely redesigned its Consent Decree e-Library website, offering the most comprehensive online collection of full municipal wet weather consent decree and enforcement orders for further review and analysis. The site also pro-

vides users with new tools to search for decrees, including by U.S. Environmental Protection Agency (EPA) region, state, or search term via a new "search box" function that allows users to create their own unique search term or query.

Taken together, the revised handbook and new e-Library will serve as key resources for the municipal clean water community on enforcement issues. NACWA is pleased to offer both to Association members free of charge as a benefit of Association membership. The Handbook is also available to for purchase to individuals outside the membership for \$200. More information on both resources is available in [Advocacy Alert 14-09](#).



NACWA Active on Clean Water Legal Issues

NACWA has been front and center on key clean water legal issues in recent weeks, filing briefs and comments on a number of critical legal advocacy issues. More information on all the Association's litigation initiatives can be found on the [Litigation Tracking](#) webpage.

Municipal Partners File in Chesapeake Bay TMDL Litigation

NACWA joined with other municipal wastewater partners on April 21 to file a brief in litigation over the final Chesapeake Bay total maximum daily load (TMDL), providing a strong defense of the watershed approach to achieve water quality improvements. The filing in *American Farm Bureau, et al. v. EPA* defends a lower court ruling upholding the TMDL and its inclusion of nonpoint source allocations. The brief argues that the U.S. Environmental Protection Agency's (EPA) inclusion of nonpoint sources in the TMDL was both legal and appropriate, and reaffirms NACWA's commitment to a holistic watershed approach as the most equitable, cost-effective, and environmentally responsible way to achieve water quality improvement. The Association also helped to organize a second brief from a group of six major U.S. cities – New York City, Baltimore, Philadelphia, Chicago, Los Angeles, and San Francisco – supporting NACWA's position and highlighting the importance of a watershed approach to municipal governments.

Next Legal Hot Topics Web Seminar is June 18

NACWA will be hosting its next *Legal Hot Topics web seminar* on June 18, 2014, from 2:00 – 3:30 pm Eastern Time. Designed to benefit municipal utility attorneys and managers, the complimentary, members only web seminar provides an excellent and convenient opportunity to keep current on the latest clean water issues, developments, trends and case law.

The agenda will feature expert attorneys providing critical legal and regulatory analysis and insight on two issues of great importance to the clean water sector – stormwater and construction law.

NACWA's *Legal Hot Topics web seminars* provide valuable information on a variety of issues including nutrient allocations in total maximum daily loads (TMDLs), biosolids management, defense of the Clean Water Act (CWA) "permit shield," the status of CWA jurisdiction, and water quality trading. Registration and additional information is available on NACWA's [website](#).

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Active Regulatory Arena CONTINUED FROM PAGE 5

these issues are being discussed and is preparing to comment on EPA's recently released revision to 94 of its human health criteria, many of which will become significantly more stringent when finalized.

Technical Workgroup Meets on Flushability of Wipes


The technical workgroup that is addressing issues related to the flushability of wipes held its first in-person meeting on May 6 and subsequently met via conference call to continue their dialogue. The workgroup is comprised of representatives from NACWA, the Water Environment Federation (WEF), the American Public Works Association (APWA), and INDA (the trade association of the nonwoven fabrics industry). The workgroup is supported by NACWA's Targeted Action Fund (TAF) and is part of NACWA's *Toilets Are Not Trashcans* initiative to keep non-flushable wipes and other materials out of the sewer

system. The meeting focused on presenting key facts about wipes from the perspectives of wastewater utilities and manufacturers and led to a productive discussion between the two groups.

A series of conference calls and two more in-person meetings of the workgroup over the summer are targeting the following objectives: characterizing the nature of impacts from wipes and other products; assessing how the Third Edition of the *INDA Flushability Guidelines* do or do not address concerns about these products; recommending actions needed to reconcile differences among the parties; and, developing a process and commitment for continued engagement among the parties to implement the recommendations. Additional information about wipes and other products that cause problems for utilities may be found at www.nacwa.org/flushables. 

Utility of the Future-Focused Delegation Attends SIWW

A utility of the future-focused delegation of U.S. water sector leaders attended *Singapore International Water Week* (SIWW), June 1-5, 2014. Participation of this important delegation was supported through a partnership between NACWA, the Water Environment Federation (WEF) and the Water Environment Research Foundation (WERF). The organizations join the Singapore Public Utility Board in congratulating scholarship recipients Jay Bernas, Hampton Roads Sanitation District, Virginia Beach, Va.; Rajendra Bhattacharai, Austin Water Utility Environmental & Regulatory Services, Austin, Texas; Tom Broderick, Loudon Water, Ashburn, Va.; Sandra Kilroy, King County Wastewater Treatment Division, Seattle, Wash.; Jim McQuarrie, Metro Wastewater Reclamation District, Denver, Colo.; Logan Olds, Victor Valley Wastewater Reclamation Authority, Hesperia, Calif.; Lou Storino, Metropolitan Water Reclamation District of Greater Chicago, Ill.; and, Diane Taniguchi-Dennis, Clean Water Services, Hillsboro, Ore. on being selected for the delegation.

SIWW is a global platform for water professionals to share innovative solutions for integration of sustainable water management strategies with urban planning processes. Scholarship recipients will receive funds for travel, lodging and registration, and will share the perspectives gained from their experiences upon their return. 



**Singapore
International
Water Week**

Legal Issues CONTINUED FROM PAGE 6

EPA's Non-Hazardous Secondary Materials Rule Challenged

NACWA continued its strong advocacy on sewage sludge incinerator (SSI) issues by filing a [brief](#) on April 28 in litigation over EPA's final Non-Hazardous Secondary Materials Rule (NHSM Rule). This rule, for the first time, classifies sewage sludge when combusted as a solid waste. The filing in *Solvay USA Inc., et al. v EPA* argues that existing federal solid waste laws have an explicit "domestic sewage exclusion" (DSE) that prevents EPA from regulating sludge as a solid waste. The NHSM Rule provides a critical regulatory foundation for EPA's SSI Rule by classifying sewage sludge when combusted as a solid waste, but does not have any direct regulatory impact on sludge that is managed via means other than incineration. NACWA's participation in the NHSM Rule legal challenge is supported by the Association's SSI Advocacy Coalition.

NACWA Comments on DC Water LTCP Modification

In mid-April, NACWA submitted [comments](#) in support of efforts by Association member agency DC Water to modify its current Long-Term Control Plan (LTCP) and related consent decree. DC Water's [plan](#) involves changes to both its LTCP and consent decree by making a significant investment in green infrastructure to reduce combined sewer overflow (CSO) events. NACWA's comments endorse DC Water's proposed plan, noting it represents an innovative approach that balances the utility's environmental responsibility to reduce water quality impairment in local waters with its equally important obligation to make sound economic investments with its rate-payers' dollars. 