

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

SUBJECT: ORC Review of Virginia's  
Submission on RTCR

FEB 07 2017

FROM: Mary Coe   
Regional Counsel

TO: Lori Reynolds  
Acting Associate Division Director  
Office of Drinking Water &  
Source Water Protection (3WP20)

The Office of Regional Counsel has completed its review of the Commonwealth of Virginia's submission seeking primacy, pursuant to the Safe Drinking Water Act, for the Revised Total Coliform Rule (RTCR) submitted for a final determination by the Region. ORC has reviewed Virginia's documentation of the Commonwealth's legal authority to require drinking water systems to meet the RTCR requirements. Specifically, this documentation consisted of the cross-walk comparing the Commonwealth's regulations to EPA's rules and the Office of Attorney General's certification that the Commonwealth's laws and regulations are duly adopted and enforceable. ORC also took into account the Drinking Water Branch's statement that it had no issues with the Commonwealth's submission. Based on ORC's review of the cross-walk, the certification, and the statement, I have concluded that the Region can approve the Commonwealth's submission pursuant to 40 C.F.R. §§ 142.12 and 13.

cc: Philip Yeany  
Patti Kay Wisniewski (3WP21)  
Kelly Moran (3WP21)

