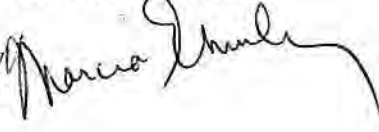


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: ORC Review of Pennsylvania's
Submission for the Groundwater Rule

FROM: Marcia E. Mulkey
Regional Counsel



JUL 10

TO: Victoria P. Binetti,
Associate Division Director
Office of Drinking Water &
Source Water Protection (3WP20)

The Office of Regional Counsel has completed its review of the Commonwealth of Pennsylvania's submission seeking primacy for the Groundwater Rule (GWR) of the Safe Drinking Water Act. Pennsylvania has requested that EPA approve the changes to its Public Water System Supervision Program (PWSS) that incorporate the Rule into the Commonwealth's PWSS Program.

ORC has reviewed Pennsylvania's documentation of the Commonwealth's legal authority to require drinking water systems to meet the Rule's requirements. Specifically, this documentation consisted of the crosswalk comparing the Commonwealth's regulations to EPA's rules and the Pennsylvania Department of Environmental Protection's Chief Counsel's certification that Pennsylvania's laws and regulations are duly adopted and enforceable. ORC also considered the comments the Drinking Water Branch had on the Commonwealth's submission. Based on ORC's review of the crosswalk, the certification, and the comments, I have concluded that the Region can approve Pennsylvania's submission.

cc: Philip Yeany (3RC20)
William Arguto (3WP21)
Nicholas Tymchenko (3WP21)
Anthony Meadows (3WP21)
Kelly Moran (3WP21)