

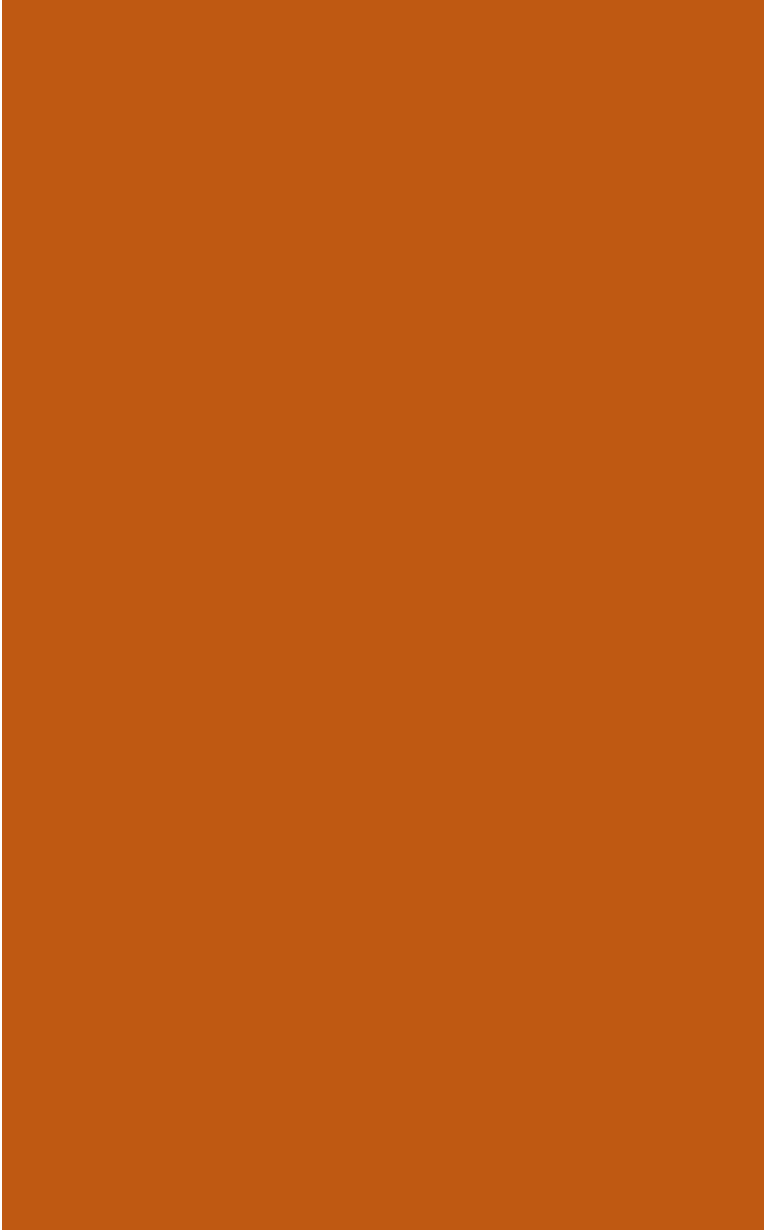

EPA WATER
DIVISION
PROGRAM
UPDATE

JANUARY 27, 2022

10:00 AM- 11:00 AM PST

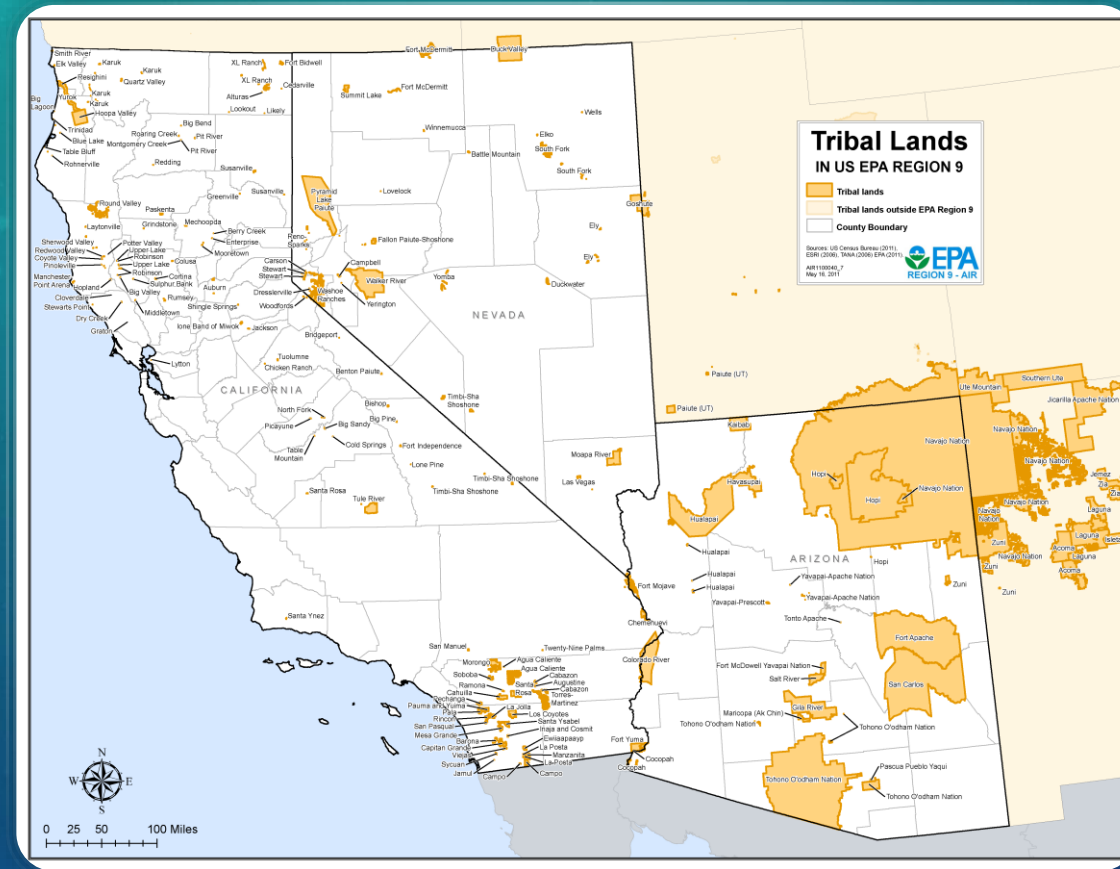
AGENDA

- **Infrastructure Bill Funding** – Nancy Sockabasin
- **Revised 401 Certification** – Sahrye Cohen
- **WOTUS** – Joe Morgan
- **Baseline WQS/Tribal Reserved Rights** – Ellen Blake
- **Outreach Resources** – Loretta Vanegas/Sofia Sotomayor



**INFRASTRUCTURE BILL
FUNDING – NANCY
SOCKABASIN**

DRINKING WATER INFRASTRUCTURE UPDATES



Upcoming tribal consultation: DWIG-TSA regional allotment formula and the Bipartisan Infrastructure Law (BIL)

January 27, 2022

UPCOMING TRIBAL DRINKING WATER CONSULTATION

- Planning for 90-day consultation: February – April
- Two tribal consultation webinars: Early March
- Topics for Consultation:
 - DWIG-TSA Regional Allotment Formula
 - Bipartisan Infrastructure Law

DWIG-TSA CONSULTATION

PART 1 - REGIONAL ALLOTMENT FORMULA

- Considers a regional base, Drinking Water Infrastructure Needs Survey and Assessment (DWINSA) data and the total feasible need of water projects in the IHS SDS



DWIG-TSA REGIONAL ALLOTMENT FORMULA

Allotment formula proposed in 2013 National Guidance was intended to more heavily weight homes that do not have access to piped water.

Using data obtained from DWINS and IHS CDP (and in the future HITS), the allotment factor for each Region is calculated by the following formula.

$$\text{Region A Allotment Factor} = 0.5 \times \left(\frac{\text{((DL 4 homes + DL 5 homes) x 2) + DL 3 homes in Region A}}{\text{((DL 4 homes + DL 5 homes) x 2) + DL 3 homes in IHS CDP (or HITS)}} \right) + 0.5 \times \left(\frac{\text{DWINS AI*+ANV Cost Data for Region A}}{\text{DWINS AI+ANV Total Cost Nationwide}} \right)$$

*AI – American Indian

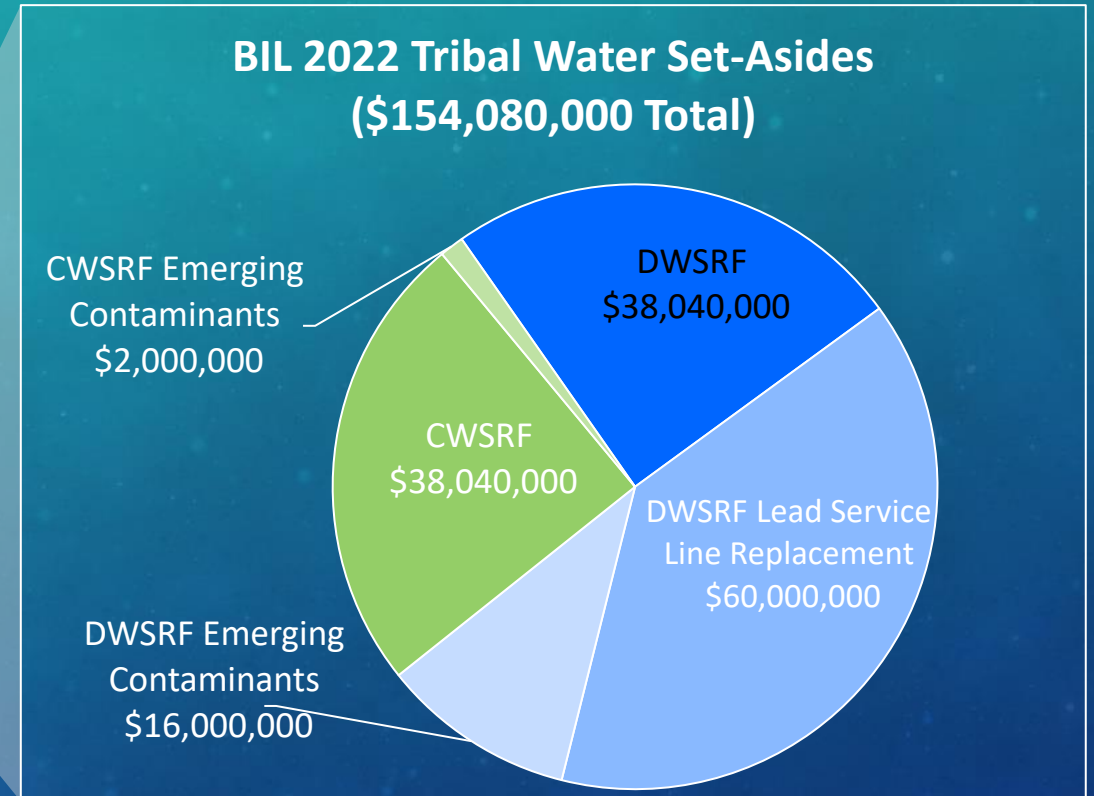
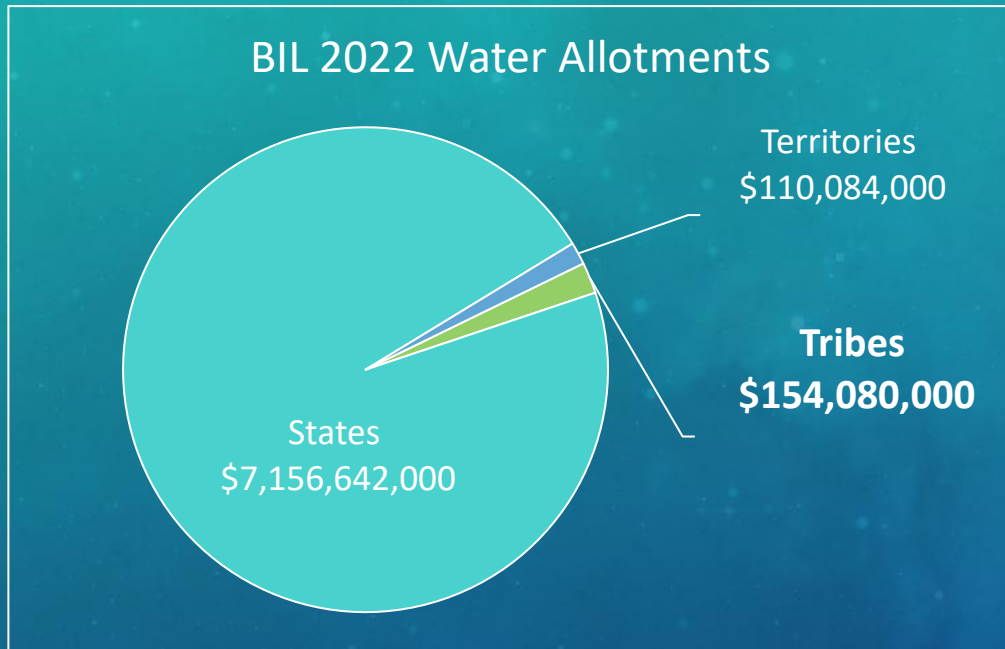
Each Regional allotment of the DWIG-TSA funds is then determined by the following formula.

$$\text{Regional A Allocation} = (2\% \times \text{DWIG TSA Appropriation}) + ((82\% \times \text{DWIG TSA Appropriation}) \times \text{Region A Allotment Factor})$$

DWIG-TSA REGIONAL ALLOTMENT FORMULA CONSIDERATIONS

- Remove or significantly diminish the regional “base” component of the allotment formula
- Focus on access needs
- Weight health-based violation needs

BIPARTISAN INFRASTRUCTURE LAW (BIL) OVERVIEW



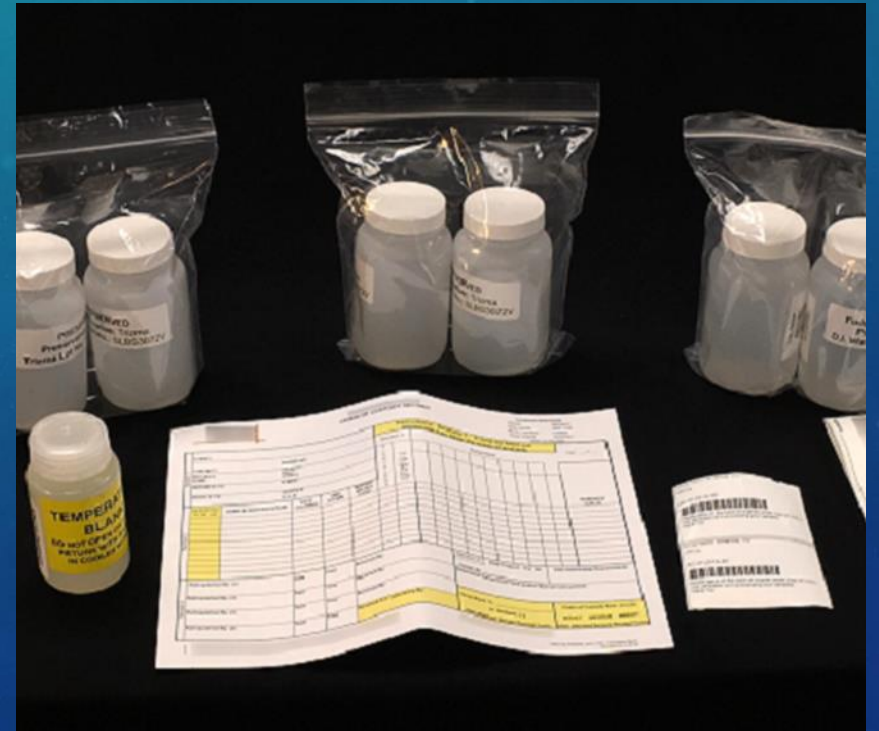
Source: December 2021 Fact Sheet <https://www.epa.gov/system/files/documents/2021-12/fy-2022-bil-srfs-allotment-summary-508.pdf>

Find the latest EPA numbers here: <https://www.epa.gov/infrastructure/water-infrastructure-investments>

DWIG-TSA CONSULTATION

PART 2 – BIPARTISAN INFRASTRUCTURE LAW (BIL)

- Looking for feedback on what factors should be considered:
 - DW funding needs related to lead service lines
 - DW funding needs related to emerging contaminants/PFAS





REVISED 401
CERTIFICATION –
SAHRYE COHEN



Clean Water Act Section 401 – Water Quality Certifications

What is the 401 Rule?

- Implements the water quality certification process in accordance with Clean Water Act
- CWA Section 401 certification required for any federal license or permit that may result in a “discharge”
- Discharge → from a point source into a water of the U.S.
- 401 certification is not its own permit action.

Examples of federal licenses and permits

Clean Water Act Section 402 and 404 permits issued by EPA or the Corps,

Federal Energy Regulatory Commission (FERC) licenses for hydropower facilities and natural gas pipelines, and

Rivers and Harbors Act Section 9 and 10 permits.

Federal Rulemaking - Clean Water Act Section 401

- 2020 401 Rule vacated October 21, 2021
- Currently implementing the 1971 Regulations
- Ongoing Rulemaking <https://www.epa.gov/cwa-401>

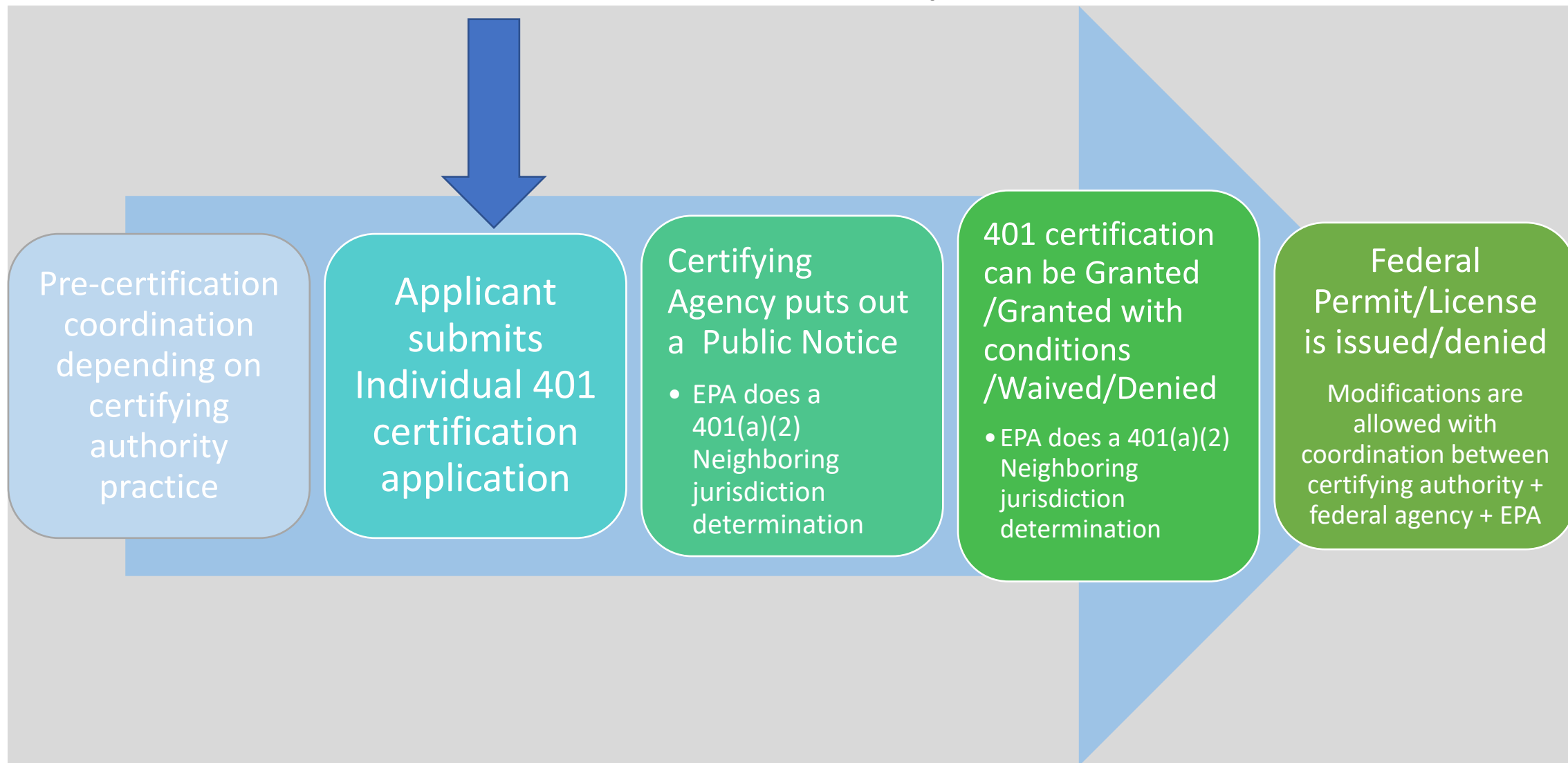


1971
Regulations

40 CFR 121

<https://www.govinfo.gov/content/pkg/CFR-2018-title40-vol24/pdf/CFR-2018-title40-vol24-part121.pdf>

Current 1971 CWA 401 implementation



Contents of Certification

- 1) Name and Address of the Applicant
- 2) Statement that the Certifying Authority has examined the application for a federal permit or license, or other information furnished by the applicant as a bases for evaluation for water quality impacts
- 3) Statement that there is a **reasonable assurance** that the activity will be conducted in a manner which will not violate applicable water quality standards
- 4) Any conditions with respect to the discharge of the activity
- 5) Such other information as the certifying authority may determine to be appropriate

Modifications

- The certifying agency may modify the certification as needed when agreed upon by the federal licensing or permitting agency, the certifying agency and the EPA.



Application Information

- Only establishes requirements when EPA acts as the certifying authority
 - a. Name and address of the applicant.
 - b. A description of the activity and any discharge into waters of the U.S. which may result from the activity.
 - c. A description of any treatments, methods or facilities to treat waste or other effluents which may be discharged.
 - d. The beginning and ending dates of the discharge, if known.
 - e. Description of proposed water quality monitoring methods.



A stylized illustration featuring a hand in a red sleeve writing on a document. A speech bubble above the hand contains the text 'PUBLIC NOTICE!' in a bold, red, distressed font. The background is a circular area with a white and grey chevron pattern in blue, yellow, and green. The entire scene is framed by colorful geometric shapes: a blue circle at the top left, an orange circle at the top right, and a green square at the bottom left.

**PUBLIC
NOTICE!**

Such **State or interstate agency shall establish procedures for public notice** in the case of all applications for certification by it and, to the extent it deems appropriate, procedures for public hearings in connection with specific applications.

Update on the New Rule

EPA plans to issue the draft 401 Rule in the **spring of 2022** for review and comment.





WOTUS – JOE MORGAN



Waters of the US: Current Status & Rulemaking

Joe Morgan, Life Scientist

EPA Region 9 Water Division – Wetlands Section

(415)972-3309

morgan.joseph@epa.gov

Winter 2022 RTOC – Water Program Updates

27 January 2022



Land and Waters Acknowledgement



www.epa.gov/wotus/

Overview

WOTUS background

- Affected CWA programs
- Past efforts to define WOTUS

Current Rule – “Pre-2015 Practice”

- Status of Navigable Waters Protection Rule

WOTUS Rulemaking

- Proposed Rule
- Anticipated future rulemaking



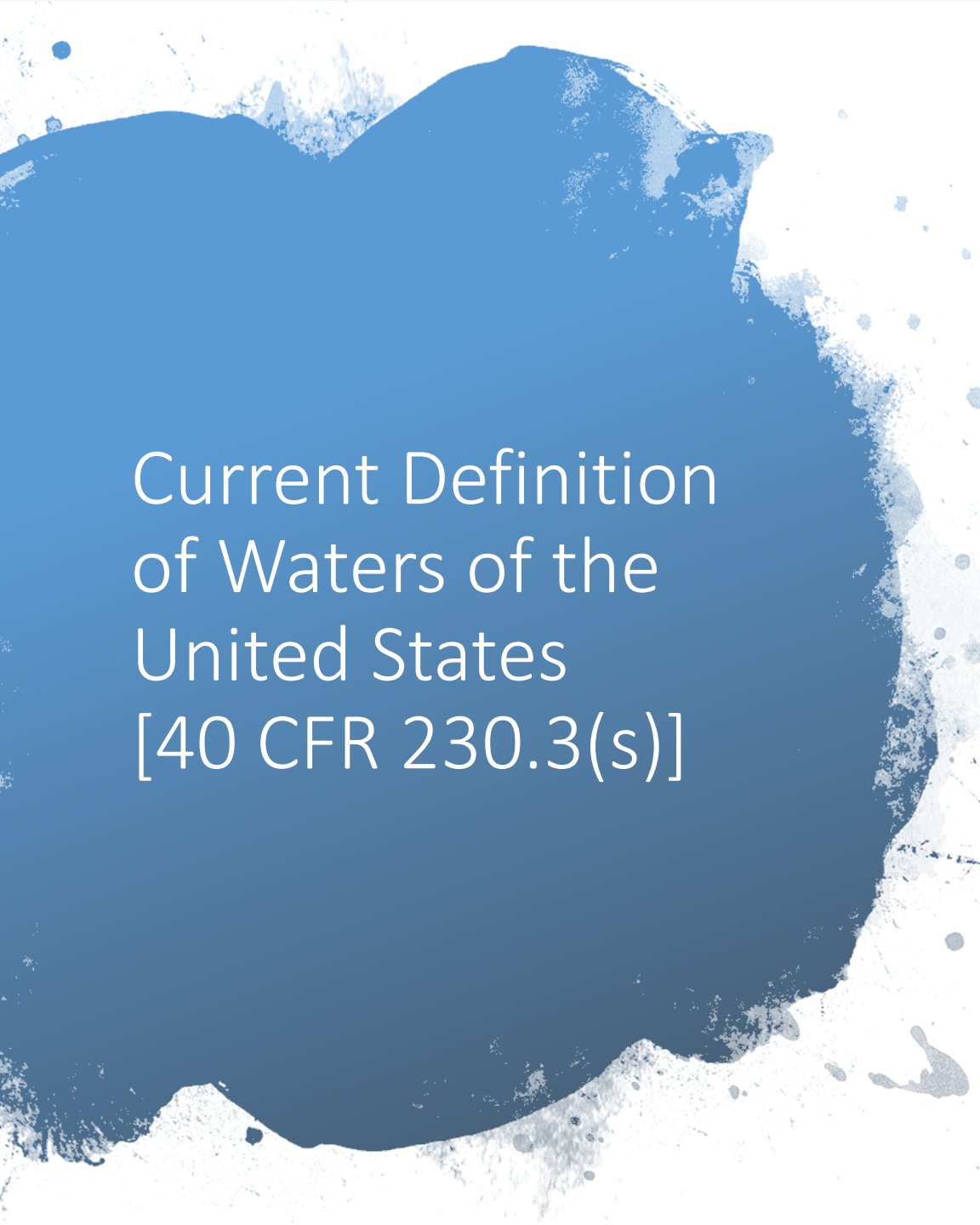
What is WOTUS?

- How does WOTUS function?
 - WOTUS is a **threshold** term interpreting the **geographic limits** of federal authority under the **regulatory programs** of the Clean Water Act
- Why is WOTUS important?
 - **WQS, impairments listing, and TMDLs** are required for WOTUS under §303
 - **Oil spill prevention programs** apply to facilities that could discharge to WOTUS under §311
 - **Point source discharges** to WOTUS are regulated under Title IV (§402, §404, §401)
 - *CWA grant programs do not rely on the WOTUS definition.*



What is WOTUS?

- Definitions of WOTUS:
 - *Pre-2015 approach – effective rule*
 - Past Rules:
 - 2015 Clean Water Rule – repealed in 2019
 - 2020 Navigable Waters Protection Rule – vacated by court order in 2021
 - Proposed Rules
 - *2021 Proposed Rule*



Current Definition of Waters of the United States [40 CFR 230.3(s)]

What it is: The rule that defined WOTUS prior to the 2015 Clean Water Rule (“*pre-2015 approach*”). Includes 1986/88 regulations as well as guidance and legal memoranda following 2001 SWANCC and 2008 Rapanos SCOTUS decisions.

Seven categories of jurisdictional waters, only waste treatment systems and prior converted cropland are excluded by rule.

2008 Rapanos guidance describes how to implement Scalia “relatively permanent” and Kennedy “significant nexus” standards.

1986/88 Regulations

40 CFR 230.3(s)

The term waters of the United States means:

1. All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
2. All interstate waters including interstate wetlands;
3. All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
 1. Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
 2. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
 3. Which are used or could be used for industrial purposes by industries in interstate commerce;
4. All impoundments of waters otherwise defined as waters of the United States under this definition;
5. Tributaries of waters identified in paragraphs (s)(1) through (4) of this section;
6. The territorial sea;
7. Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (s)(1) through (6) of this section; waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States.

Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA.

Summary of Key Points

The agencies will assert jurisdiction over the following waters:

- Traditional navigable waters
- Wetlands adjacent to traditional navigable waters
- Non-navigable tributaries of traditional navigable waters that are relatively permanent where the tributaries typically flow year-round or have continuous flow at least seasonally (e.g., typically three months)
- Wetlands that directly abut such tributaries

The agencies will decide jurisdiction over the following waters based on a fact-specific analysis to determine whether they have a significant nexus with a traditional navigable water:

- Non-navigable tributaries that are not relatively permanent
- Wetlands adjacent to non-navigable tributaries that are not relatively permanent
- Wetlands adjacent to but that do not directly abut a relatively permanent non-navigable tributary

The agencies generally will not assert jurisdiction over the following features:

- Swales or erosional features (e.g., gullies, small washes characterized by low volume, infrequent, or short duration flow)
- Ditches (including roadside ditches) excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water

The agencies will apply the significant nexus standard as follows:

- A significant nexus analysis will assess the flow characteristics and functions of the tributary itself and the functions performed by all wetlands adjacent to the tributary to determine if they significantly affect the chemical, physical and biological integrity of downstream traditional navigable waters
- Significant nexus includes consideration of hydrologic and ecologic factors

<https://www.epa.gov/wotus/rapanos-v-united-states-carabell-v-united-states>

Navigable Waters Protection Rule (NWPR)

- Executive Order 13990 identified NWPR as rule for review under the new administration
 - July 30th, 2021 – EPA & Army release FRN detailing 2-part rulemaking strategy to replace NWPR with pre-existing WOTUS definition, craft new rule
- August 30th, 2021 – ***NWPR remanded and vacated nationwide*** in *Pascua Yaqui vs. EPA* and subsequently in *Navajo Nation vs. Regan*. Agencies halt NWPR implementation.
- November 18th, 2021 – EPA and Army release proposal to redefine Waters of the United States and repeal NWPR.

Redefining WOTUS – Proposed Rule

- Formally remove NWPR definitions from 40 C.F.R. Part 120, and replace with modified version of 1986/88 regulations that incorporates Supreme Court Rapanos standards of “relatively permanent” and “significant nexus”
- Pre-proposal tribal consultation on Rule 1 concluded on October 4th
- Supporting documents:
 - Economic analysis
 - Technical support document
- *Published in Federal Register on November 18th, accepting comments from public until February 7th*

Proposed Rule: Regulatory Text Overview

Structured like the agencies' pre-2015 regulations:

- (a)(1) – Traditional navigable waters (no change)
- (a)(2) – Interstate waters (no change)
- (a)(3) – All other waters...*
- (a)(4) – Impoundments*
- (a)(5) – Tributaries*
- (a)(6) – Territorial seas (no change)
- (a)(7) – Adjacent wetlands*
- Waters of the United States do not include prior converted cropland or waste treatment systems

*** Categories of waters from the pre-2015 regulations, revised to reflect consideration of *SWANCC* and *Rapanos* Supreme Court decisions**

Proposed Rule: Foundational Waters

- The proposed rule would not change the pre-2015 approach to (a)(1) Traditional navigable waters, (a)(2) Interstate waters, & (a)(6) Territorial seas.
 - These waters are referred to in the preamble as “foundational waters.”
- The proposal restores interstate waters as a category of “waters of the United States” – they were eliminated as an independent source of jurisdiction under the Navigable Waters Protection Rule (NWPR).
 - Though there are no changes proposed in the regulatory text, ***the agencies are seeking comment on the scope of implementation for interstate waters (e.g., waters that flow across, or form a part of, boundaries of federally recognized tribes).***

Proposed Rule: (a)(4) Impoundments

- The proposed rule incorporates minor changes to the impoundments category compared to the pre-2015 rule
 - Impoundments of jurisdictional waters would remain jurisdictional under this category of the proposal except for impoundments of (a)(3) “other waters.”
 - However, impoundments of (a)(3) “other waters” could still be jurisdictional if they still meet the criteria for jurisdiction under (a)(3).
- The agencies are specifically seeking comment on the scope of implementation for impoundments.

Proposed Rule: (a)(3) Other Waters

- The proposed rule would include the “other waters” category from the pre-2015 regulations but with changes informed by relevant Supreme Court precedent.
- “Other waters” include a variety of waters that do not otherwise meet the other categories of “waters of the United States” under the proposed rule, such as non-navigable, intrastate, “isolated” ponds and wetlands.
- The proposed rule would ***replace the interstate commerce test from the pre-2015 regulations with the relatively permanent and significant nexus standards***, reflecting consideration of the *SWANCC* and *Rapanos* decisions.
- The agencies solicit comment on a variety of implementation options for “other waters” in the preamble.

Proposed Rule: (a)(5) Tributaries

- The proposed rule would include the “tributaries” category from the pre-2015 regulations but with changes informed by relevant Supreme Court precedent.
- Tributaries under the proposed rule are typically streams and rivers, even lakes and ponds, that flow directly or indirectly into foundational waters or (a)(4) impoundments.
- The proposed rule would define “waters of the United States” to include tributaries of traditional navigable waters, interstate waters, impoundments, or the territorial seas ***if the tributary meets either the relatively permanent standard or the significant nexus standard.***
- The agencies solicit comment on a variety of implementation approaches for tributaries in the preamble, including how to implement the relatively permanent standard.

Proposed Rule: (a)(7) Adjacent Wetlands

- The proposed rule would include the “adjacent wetlands” category from the pre-2015 regulations but with changes informed by relevant Supreme Court precedent.
- The proposed rule would not change the longstanding (pre-NWPR) definition of “adjacent,” but rather would ***add language to the provision establishing which adjacent wetlands can be considered “waters of the United States” to reflect the relatively permanent and significant nexus standards.***

Proposed Rule: Definition of “Significantly Affect”

- “Significantly affect” as proposed means more than speculative or insubstantial effects on the chemical, physical, or biological integrity of foundational waters.
- When assessing whether the effect that the functions waters have on foundational waters is more than speculative or insubstantial, the agencies propose factors to consider:
 - The distance from a water of the United States;
 - The distance from a foundational water;
 - Hydrologic factors, including shallow subsurface flow;
 - The size, density, and/or number of waters that have been determined to be similarly situated; and
 - Climatological variables such as temperature, rainfall, and snowpack.

Proposed Rule: Exclusions and Waters Generally Not Jurisdictional

Exclusions (Regulatory Text)

- Waste Treatment Systems (1979)
- Prior Converted Cropland (1993)

“Generally not Jurisdictional” (Preamble*):

- Certain ditches
- Artificially irrigated areas
- Certain artificial lakes or ponds
- Groundwater

* Note: this list is not inclusive and additional features are included in the proposed preamble as “generally not jurisdictional.”

Proposed
Rule:
Submitting
Comments

*Published in Federal Register on November 18th,
accepting comments from public until February 7th*

Written comments can be submitted to OW-Docket@epa.gov, include Docket ID No. EPA-HQ-OW-2021-0602

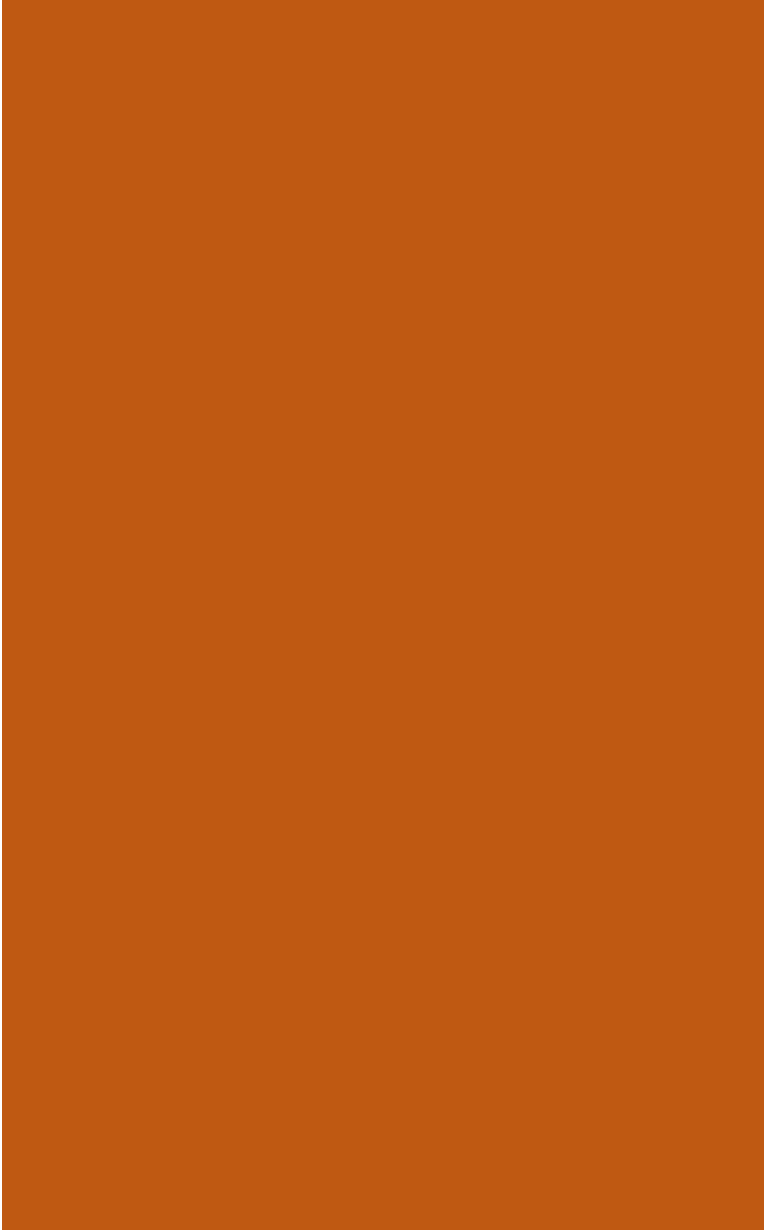

*Tribes wishing to consult on the proposed rule
should email CWAwotus@epa.gov as soon as
possible to schedule consultation before the end of
the comment period.*

Redefining WOTUS – Anticipated future rulemaking

- The agencies anticipate proposing a second rule in the future that would build on the regulatory foundation in the proposed rule.
- Would not be tied to prior WOTUS definitions, but may draw from those approaches as appropriate.
- The agencies would initiate a separate consultation for such a rulemaking.

Thank you for your time!

Questions?



BASELINE WATER
QUALITY
STANDARDS/TRIBAL
RESERVED RIGHTS –
ELLEN BLAKE



Water Quality Standards: January 2022 Update on Two Federal Rulemakings

Ellen Blake
Assistant Director
Water Division
Surface Water Branch
EPA Region 9



Tribal Reserved Rights in WQS Rule (40 CFR Part 131 Revision)

Why is this necessary?

- Tribes hold reserved rights to aquatic resources, (e.g. the right to fish or harvest aquatic plants) through treaties and other agreements on lands and waters where states have CWA WQS jurisdiction.

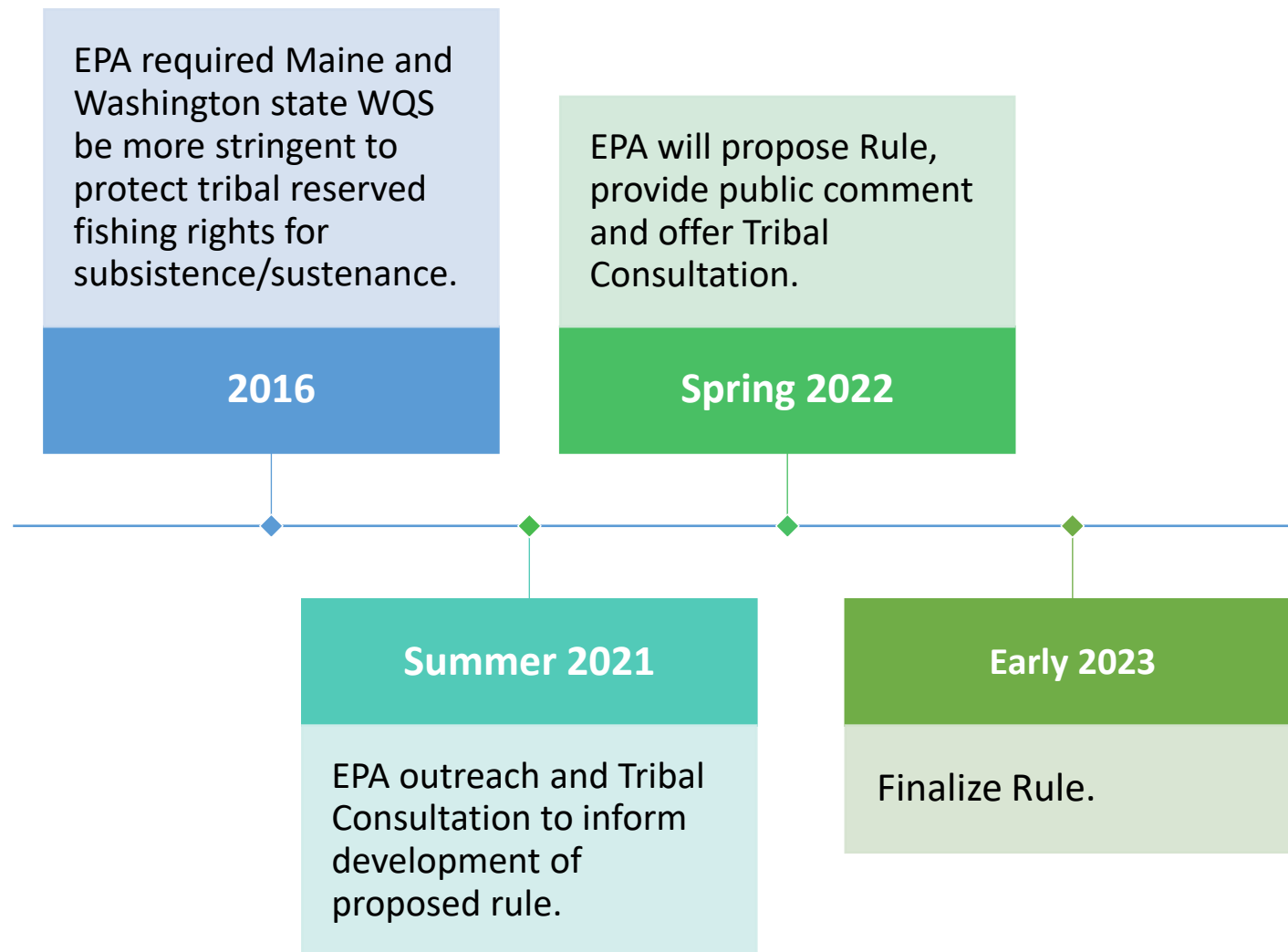
What is the Purpose?

- To explain how tribal reserved rights must be protected in state or federal WQS.

What are the Potential Benefits?

- Sustainable and transparent regulatory framework
- Require protection of tribal reserved rights in future WQS actions.
- National discussion on how to harmonize CWA WQS with tribal reserved rights

WQS for Tribal Reserved Rights Rule History and Next Steps



Federal Baseline WQS Rule for Indian Reservations

WHY?

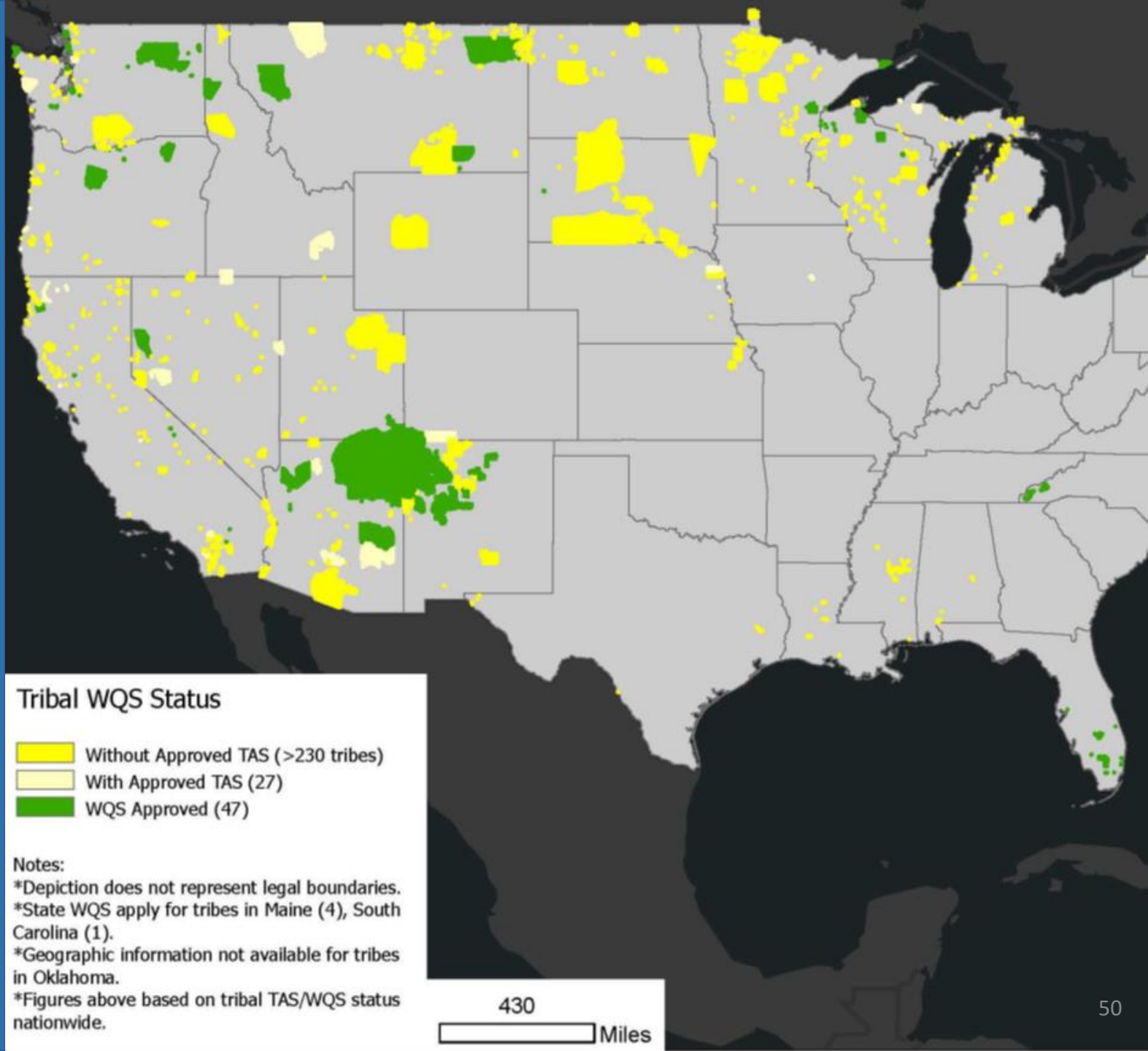
- Less than 20 % of reservation waters have CWA WQS
- Longstanding gap in CWA protection

BENEFITS?

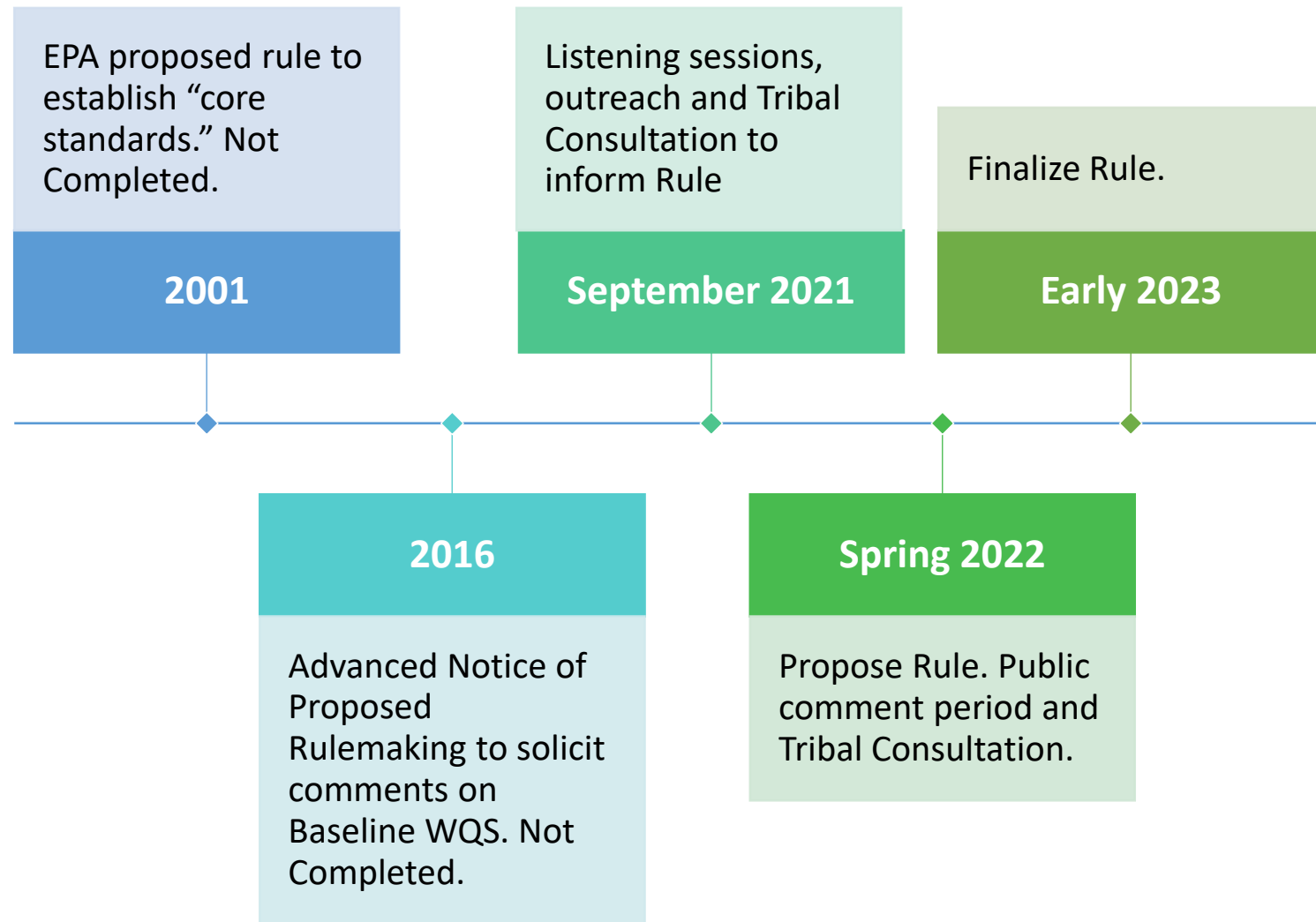
- Establishes WQ goals on Reservation waters based on scientific rigor
- Basis for enforceable NPDES + other permits (regulatory certainty)
- Protects from Upstream Discharges
- Basis to determine WQ Impairments

WHERE?

- Applies to Reservation waters with no EPA approved Tribal WQS
- Will **not apply** to:
 - Waters with EPA approved Tribal WQS
 - Off Reservation allotments
 - Reservations that “Opt-Out”



Federal Tribal Baseline WQS Rule History and Next Steps



Resources and Contacts

Water Quality Standards

Region 9: Yin.Tina@epa.gov

Reserved Rights Rulemaking: <https://www.epa.gov/wqs-tech/reviving-federal-water-quality-standards-regulations-protect-tribal-reserved-rights>

Baseline Rulemaking: <https://www.epa.gov/wqs-tech/promulgation-tribal-baseline-water-quality-standards-under-clean-water-act>

NPDES Permits

Region 9: Sablad.Elizabeth@epa.gov

<https://www.epa.gov/npdes-permits/npdes-permits-epas-pacific-southwest-region-9>

CWA 401

Region 9: Cohen.Sahrye@epa.gov

<https://www.epa.gov/tribal-pacific-sw/epas-water-quality-certifications-tribal-lands-pacific-southwest>

Rulemaking: <https://www.epa.gov/cwa-401> (email: cwa401@epa.gov)

Region 9 Email: R9cwa401@epa.gov

WOTUS

Region 9: Cohen.Sahrye@epa.gov

Rulemaking: <https://www.epa.gov/wotus> (email: CWAwotus@epa.gov and usarmy.pentagon.hqda-asa-cw.mbx.asa-cw-reporting@mail.mil)



OUTREACH RESOURCES
– LORETTA VANEGAS
AND SOFIA SOTOMAYOR

CONSOLIDATED EPA WATER ACTIONS AND TRIBAL ENGAGEMENT CALENDAR”

Winter RTOC 1/27



“TRYING TO KEEP UP WITH
ALL THESE IMPORTANT
DATES ...IT’S LIKE DRINKING
FROM A FIRE HOSE...”



**Tribal Engagement Opportunities
for National and Regional* Water Actions**

January 2022

Highlights for January	
12, 13, 18	WOTUS Virtual Public Hearings
25-27	Winter RTOC

MON	TUE	WED	THU	FRI	SAT	SUN
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
		WOTUS: Virtual Public Hearing 7-10am PST, register here .	WOTUS: Virtual Public Hearing 11am-2pm PST, register here .			
17	18	19	20	21	22	23
	WOTUS: Virtual Public Hearing 2-5pm PST, register here .		WOTUS: Webinar discussion for tribes 9am-12pm PST, register here .			

Tribal Engagement Opportunities for National and Regional Water Actions 2022

National Consultations

Revised Definition of “Waters of the United States”: EPA and Army will publish a proposed Rule, “Revised Definition of “Waters of the U.S.” This proposal puts back into place the pre-2015 definition of WOTUS, updated to reflect consideration of Supreme Court decisions. There will be a 60-day public comment period on the proposed rule which will begin with its publication in the Federal Register.

Offer to Consult: December 7th 2021- February 7th 2022.

Submit Comments: To the docket, [here](#).

Request Agency Consultation: Contact Rose Kwok at cwawotus@epa.gov before end of comment period.

Virtual Public Hearings: January 12th (7-10am PT), register [here](#); January 13th (11am-2pm PT) register [here](#); January 18th (2-5pm PT) register [here](#); January 19th (12pm PT), register [here](#). Information on how to participate will be available on EPA’s [website](#). There is also anticipated engagement via regional roundtables announced in October, details forthcoming.

Region 9 Contact: Sahrye Cohen, email cohen.sahrye@epa.gov

Tribal CWA 319 Equity Engagement: On September 27 Lynda Hall shared a memo, entitled [Near-term Actions to Support Environmental Justice in the Section 319 Program](#). In the memo EPA commits to take actions to ensure equitable and fair access to the benefits of cleaner water provided by the Section 319 program. Specifically, the memo strongly encourages action in FY22 by state NPS programs to begin incorporating approaches to enhance environmental equity in funding programs. Additionally, the memo commits EPA’s national NPS program to several actions in FY22 in support of this goal, including seeking in progress via quarterly engagements with State, Tribal and Territorial grantees. Recognizing that this will be a shared learning experience, we are committed to ongoing dialogue with the NPS community as this work goes forward.

Listening Sessions: Kick-off Engagement Call with 319 Grantees 12/9, 11am-12pm PST, register [here](#). Stay tuned for Regional 319 Equity Discussion call with Margot Buckelew (HQ NPS branch) expected in Jan-Feb timeframe.

Region 9 Contact: Howard Kahan, email Kahan.Howard@epa.gov

HQ Contact: Steve Epting, email epting.steve@epa.gov

Federal Baseline Water Quality Standards for Indian Reservations: In September 2016, EPA published an advance notice of proposed rulemaking (ANPR) on whether to establish federal baseline water quality standards for waters on Indian reservations that do not yet have standards under the Clean Water Act (CWA) and, if so, what those standards should be and how they should be implemented. During a 90-day public comment period, EPA received comments from tribal governments and associations; state officials, agencies, and associations; private citizens; and private entities. EPA’s goal in initiating this rulemaking is to identify ways to address the existing gaps in CWA protection of reservation waters.

Offer to Consult: 06/15/2021-09/13/2021

Submit Written Feedback: to Mary Lou Soscia, Email: soscia.marylou@epa.gov

Region 9 Contact: Kate Pinkerton, Email: Pinkerton.kate@epa.gov or Terry Fleming, email: Fleming.Terrance@epa.gov

Water Quality Standards Regulatory Revisions to Protect Tribal Reserved Rights: Tribes hold many reserved rights to resources on lands and waters under federal jurisdiction, through treaties and equivalent agreements with the U.S. government. The U.S. Constitution defines treaties as the supreme law of the land. EPA is pursuing a change to its water quality standards regulations to codify the path to compliance with existing legal obligations to ensure that water quality standards do not impair tribal reserved rights and give clear and sustainable direction as to the scope of states’ obligations. This will help EPA ensure protection of reserved rights to tribes in treaties and equivalent agreements when establishing, revising, and reviewing water quality standards.

Offer to Consult: 06/15/2021-09/13/2021

- Summary of Rulemaking
- Key Dates
- HQ contact
- Region 9 Contact

THANK YOU!

Contact info:

- Nancy Sockabasin – sockabasin.nancy@epa.gov
- Sahrye Cohen – cohen.sahrye@epa.gov
- Joe Morgan – morgan.joseph@epa.gov
- Ellen Blake/Tina Yin – blake.ellen@epa.gov / yin.tina@epa.gov
- Loretta Vanegas - vanegas.loretta@epa.gov
- Sofia Sotomayor - sotomayor.sofia@epa.gov