



October 16, 2015

Mr. Michael Shapiro
Deputy Assistant Administrator
Office of Water
US Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Mail Code: 4101M
Washington, DC 20460

Dear Mr. Shapiro:

We are writing in regard to the employment status of Ms. Maureen Tooke Pepper, who is the only full-time EPA employee assigned to EPA's Decentralized Wastewater Management Program. Currently she is located in EPA's Region 10 Office in Boise, ID. It is our understanding that because that program is based at EPA Headquarters, she must soon either resign her position or relocate to Washington. It is also our understanding that relocating back to the Washington area is not an option for her.

On behalf of the undersigned we wish to formally request that EPA make an exception on Ms. Pepper's behalf and allow her to remain in her current position. Normally we would not be inclined to comment on internal EPA personnel matters; however, we feel that this circumstance is extraordinary and of particular importance to the decentralized wastewater community.

As you know, more than 25% of the country relies on onsite/decentralized systems. According to a recent survey conducted by the State Onsite Regulators Alliance, more than 85 million Americans are served by this technology. While EPA has virtually no direct regulatory authority over decentralized wastewater management, it has nevertheless played a major leadership role in advancing the science, practices and policies which govern this segment of our nation's permanent wastewater infrastructure by facilitating a collaborative effort which seeks to modernize the industry.

In addition to being the only viable solution for rural and suburban areas where centralized sewer is not feasible, decentralized (also called distributed) wastewater treatment is expected to grow in importance within municipal utilities' infrastructure mix. As noted in the report issued by the Johnson Foundation at Wingspread's Charting New Waters initiative, *Optimizing the Structure and Scale of Urban Water*

Mr. Michael Shapiro
October 16, 2015
Page 2

Infrastructure: Integrating Distributed Systems, there is a “palpable shift that has occurred in recent years, from distributed infrastructure being a niche topic in which only a small minority was interested, to a concept for which momentum is growing and dialogue is moving into the mainstream. It now seems clear that distributed infrastructure will undoubtedly play a significant role in the future of U.S. water infrastructure, even as elements of our existing centralized water systems remain in use. The group assembled at Wingspread recognized that distributed water systems offer benefits that reach far beyond water and will likely be an integral component of the cities of the future.”

Over the past several years, full-time staff and equivalents in EPA’s Decentralized Program office have been cut from 4 employees to just one, Ms. Pepper. In conversations with Dr. Andrew Sawyers, it is our understanding that should Ms. Pepper not be allowed to stay in her position that a replacement would be identified. We are pleased that EPA is committed to continuing to provide some level of support to the 85 million Americans who rely on decentralized wastewater treatment. However, we are concerned that Ms. Pepper’s departure would significantly inhibit the agency’s ability to provide meaningful leadership and support to decentralized wastewater stakeholders.

EPA’s leadership role within the decentralized wastewater community relies on the ability of a seasoned individual to identify and coordinate activity among a wide and highly diffuse array of decentralized wastewater stakeholders at the local, state and national levels. Because of her long tenure in this program, Ms. Pepper possesses extensive institutional knowledge and understanding of the important issues facing the decentralized wastewater treatment community.

Ms. Pepper has been critically involved with a number of regional and national EPA programs, providing leadership which has served both the interests of the agency and the decentralized wastewater community well. Currently she is deeply involved with the Septic Smart public education program, and is coordinating regional and national efforts of data sharing between states which will help facilitate faster deployment of new decentralized treatment technologies. She also developed one of the first deliverables in support of the Chesapeake Bay Executive Order. She also coordinates the programs developed through the efforts of the highly successful EPA Decentralized MOU Partnership. A large part of the success she has enjoyed in helping to move initiatives forward derives from her institutional knowledge – understanding all of the many stakeholders inside and outside the agency and how to navigate the landscape for maximum benefit. This type of ‘insider’ understanding is difficult to transfer to someone new. Experience is the only teacher.

Ms. Pepper’s institutional knowledge is particularly critical since she is the only full-time employee involved with the Decentralized Wastewater Treatment Program. Six months ago, Joyce Hudson, the long-time leader of that program, retired. Between them they had roughly 40 years of institutional knowledge. In a few short months, the person running that program may potentially have zero years of institutional knowledge about decentralized wastewater.

Both the agency and the decentralized wastewater treatment community would be poorly served if Ms Pepper relinquishes her position. Candidly, at a time when decentralized systems are poised to play an even larger role in our nation’s wastewater infrastructure, losing virtually all of what remains of the agency’s institutional knowledge of the decentralized wastewater community could be needlessly

Mr. Michael Shapiro

October 16, 2015

Page 3

crippling to the current initiatives underway in the Decentralized Wastewater Management Program and highly disruptive to the state and local regulators, industry practitioners, manufacturers, scientists and other stakeholders who look to EPA for support and leadership.

What's more, she is greatly interested in continuing in her present role, and the undersigned believe she enjoys widespread support and respect within the community for the work she has done.

One example of Ms. Pepper's effectiveness is Septic Smart Week. Now in its third year, the event is growing exponentially in terms of its impact, with increasing numbers of organizations holding events tied to Septic Smart Week, greater traditional media coverage and social media buzz. Without Ms. Pepper's leadership and institutional knowledge – clearly demonstrated by her ability to leverage relationships, encourage partnerships, and find the right people to help spread the word – the program would surely not enjoy anywhere near the success that it has.

We hope you will positively consider our request and provide an exception which will allow Ms. Pepper to keep her current position while working out of the Region 10 Office. Thank you in advance for your consideration.

Sincerely,



Eric Casey

Executive Director

National Onsite Wastewater Recycling Association (NOWRA)



Jeff Rachlin

President

National Association of Wastewater Technicians (NAWT)



Dr. Gerald Iwan

Director

National Environmental Services Center (NESC)

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