Commonwealth of Pennsylvania Sewage Advisory Committee Minutes of the Meeting March 24, 2015

Membership and function of the Sewage Advisory Committee is established by 35 P.S § 750.4. Successors to the entities listed in the statute retain the right to representation of the original organization named in the statute, but are not entitled to more than one member, if they have merged.

Sixteen (16) organizations with voting members/alternates were recorded as present. Fourteen (14) organizations' members/alternates were Not Present. Three (3) member organizations have no current appointed member or alternate. The minimum quorum is one third of 30 appointed members/alternates able to cast votes. For this meeting, sixteen (16) organizations were present which exceeds the minimum ten (10) for a quorum.

Members are shown in boldface. Organizations and members and/or alternates present are indicated by mark (\triangleright).

Member Alternate Member	Organization
Jacqueline Peleschak, P.E. Mark Malarich, P.E.	American Council of Engineering Companies of Pennsylvania
Arthur Adams, AIA No alternate	American Institute of ArchitectsPennsylvania
► John Wagman Bernard Telatovich	American Society of Civil Engineers
Scott Russell, P.E. Michael Schober, P.E.	American Water Works Association (PA Section)
► Commissioner Matt Osterberg Lisa Schaefer	County Commissioners Association of Pennsylvania
Ralph DeFazio ► Kyle Schmeck	County Departments of Health, Local Health Agencies
Secretary Alan Walker ► Sandra Orth	Department of Community & Economic Development
► Jessica Shirley Andrew Paris	Governor's Policy Office
Charles Herr Andy Jantzer	PA Municipal League
(No member)	Mortgage Bankers Association of Pennsylvania

(No alternate)	
David R. Kauffman, P.E. J.T. Hand	National Association of Water Companies
Michael McGraw (No alternate)	Pennsylvania Association of Plumbing, Heating & Cooling Contractors
► Bruce Willman Mark Mills	Pennsylvania Association of Professional Soil Scientists (PAPSS)
► Robert Wood William McLaughlin	Pennsylvania Association of Realtors
► Chris Wood [Vice-Chairperson] Kevin Bitz	Pennsylvania Association of Sewage Enforcement Officers
► Andrew Bockis Alexandra Chiaruttini	Pennsylvania Bar Association
John Gigliotti Sarah Miller	Pennsylvania Builders Association
Kevin Garber Paul King	Pennsylvania Environmental Council, Inc.
► Keith Klingler (no alternate)	Pennsylvania Landowners Association, Inc.
Wayne Schutz ► Cory Miller	Pennsylvania Municipal Authorities Association
► Gregory Marshall ► Brad Hengst	Pennsylvania Onsite Wastewater Recycling Association
Mourice Waltz Eugene Briggs, AICP	Pennsylvania Planning Association
► Joe Valentine Jeff Rachlin	Pennsylvania Septage Management Association
Brian Book, P.E. John Fuehrer, II, P.E.	Pennsylvania Society of Professional Engineers
Dan O'Connell Ronald Grutza	Pennsylvania State Association of Boroughs
► Comm. Ginnie Anderson Kane (No alternate)	Pennsylvania Association of Township Commissioners
Andrew J. Boni ▶ James Wheeler	Pennsylvania State Association of Township Supervisors
Dr. Patrick Drohan	The Pennsylvania State University

Dr. Henry Lin		
▶ Duane E. Mowery [Chairperson] Alison J. Shuler	Pennsylvania Water Environment Association	
Samuel M. D'Alessandro, P.E., P.P., P.L.S. (No alternate)	Pennsylvania Vacation Land Developers Association	
John Williams Susanne Gantz	USDA Rural Development Mission Area	
Organization internal policy no longer allows participation	US Department of Housing and Urban Development	
Organization currently no longer functioning	Pennsylvania Environmental Health Association	
Other attendees:		
Kevin Callahan	Site Specific Design Inc.	
Susan Myerov	PA Environmental Council	
DEP Representatives:		
Kim Childe	Attorney, Regulatory Counsel	
John Diehl	Chief, Act 537 Management Section, Division of Planning and Permits, Bureau of Point and Non-Point Source Management (BPNPSM)	
Ronald Furlan	Environmental Program Manager, BPNPSM	
Nick Hong	EES, Act 537 Management Section, BPNPSM	
Beth Mahoney	Sewage Planning Supervisor, SERO	
Lee McDonnell	Director, BPNPSM	
Donna Suevo	Sewage Planning Supervisor, SERO	
Michelle Tate	PA CAC	
Janice Vollero	WPS, Act 537 Management Section, BPNPSM	

Call to Order

The meeting was called to order by Chairman Duane Mowery at 10:34 am in Room 105 of the Rachel Carson State Office Building. Meeting sign-in sheets were circulated and a quorum was present.

Action Items:

Approval of the Minutes of the November 5, 2014 Meeting

The meeting minutes from November 5, 2014 were unanimously approved without changes by the Committee.

Administrative Items:

In Memoriam of Barbara Brown

In recognition of Barbara Brown who served on the Sewage Advisory Committee (SAC) both as Chairperson and as a long time member, a plaque honoring her services was given to Art Brown, Barbara's spouse, at the Western PASEO Conference in March 2015. Barbara Brown passed away in August 2014.

Nominations for Chairperson/Vice-Chairperson

Due to Ralph Defazio's retirement from the Chester County Health Department and departure from the SAC, a new nominating committee to elect officers for the sewage advisory committee was formed after the November 2014 meeting. A nominating committee comprising of John Wagman, Dan O'Connell, and Joe Valentine nominated Duane Mowery as Chairperson and James Wheeler as Vice-Chairperson. The committee unanimously elected the nominees.

Discussion / Information Items:

SAC Bylaws

DEP's Policy Office suggested that advisory committees review their committee bylaws for possible changes. Appendix 1 shows the suggested changes made by DEP personnel.

The committee requested that the following changes be made:

- (1) The bylaws should include the organizations identified in Act 537 and the organizations as the Secretary deems as necessary.
- (2) In Section 6a, the procedure for using a "ballot" is archaic and should be replaced with the procedure identified by Robert's Rules of Order.

The committee suggested that the bylaws reflect the aforementioned changes and be placed on the agenda at the next meeting for committee approval.

Geothermal Well Isolation Distance

For geothermal well isolation distances, John Diehl proposed that the isolation distances suggested in the draft Chapter 73a be utilized. The impetus for the isolation distance proposal is concern that the borehole may act as a conduit for contaminants to adversely impact a water supply well. The draft geothermal well isolation distance proposed by DEP to the advisory committee is shown as Exhibit 1.

Exhibit 1

Draft Geothermal Well Isolation Distance

The minimum horizontal isolation distances between the features named and treatment tanks, dosing tanks, holding tanks, lift pump tanks, filter tanks, chlorine contact tanks and evapotranspiration systems shall comply with the following:

50 feet	Geothermal heating system wells, except wells sealed in accordance with
	the Department's well abandonment guidelines

The following minimum horizontal isolation distances shall be maintained between the features named and the perimeter of the aggregate in the absorption area:

100 feet	Geothermal heating system wells, except wells sealed in accordance with the	
	Department's well abandonment guidelines	

The following minimum horizontal isolation distances shall be maintained between the features named and the wetted perimeter of the spray field:

100 feet	Geothermal heating system wells except wells sealed in accordance with the
	Department's well abandonment guidelines

The committee indicated that conversations with several different professional geologists suggested that the geothermal well isolation distance is dependent upon how the well is constructed. Current practice has the isolation distance between 0 and 100 feet. The committee suggested that the DEP's proposal include additional clarity. In particular, utilizing the well abandonment procedure suggests that the geothermal well isolation distance is no longer in use when it is in fact active. Chairperson Mowery appointed Greg Marshall to Chair a subcommittee to propose isolation distances for geothermal wells.

Workgroup Comments on drafts Chapter 71, 72, and 73

Chairman Mowery announced that a workgroup subcommittee had convened in December 2014 to review and comment on the Department's proposed amendments to Chapter 71, 72 and 73. The primary objective to the changes was targeted amendments to the regulations that allow for the use of onlot alternate technologies during new land development planning.

The Department distributed electronic copies of the proposed regulatory amendments compiled by the SAC workgroup and the Department.

Comments on Chapter 71

Draft Section 71.55(a)(2): The committee suggested that the term "any" onlot sewage disposal be removed. The revised language should read "The subdivision has been determined to have soils and site conditions which are suitable for the use of onlot sewage disposal technology approved for use by the Department."

Draft Section 71.62(b)(2)(iii): The committee suggested that selection of an onlot system during planning should not be required to submit an amended plan if the selected technology differs from the original plan provided that the site testing is the same.

Comments on Chapter 72

No comments.

Comments on Chapter 73

Draft Section 73.14(a)(1): The committee questioned whether a minimum of two soil excavations should be required in repair situations. In repair situations, they suggested that the regulation include language for discretion by the soil scientists on the number of soil pits. The committee also suggested in repair situations to accommodate for smaller usable lot area to include language that would not eliminate the disturbed areas near the excavation profile. The committee agreed to incorporate this suggestion in the companion document.

The Department suggested that the local agency has latitude in repair situations through Section 73.3(b).

Draft Section 73.1 and 73.55: The committee suggested that the sand specifications for elevated sand mounds should not be changed from the current regulations unless there is some science to support a change in the sand specifications. They stated that malfunctioning sand mounds may be due to the quality of the sand and not the sand specification.

Draft Section 73.1- Definition of limiting zone: An excerpt for the draft regulations on limiting zone is as follows:

Limiting zone—A soil horizon or condition in the soil profile or underlying strata that includes one of the following:

(i) Evidence of prolonged saturation determined by direct observation or indicated by redoximorphic features.

The committee was concerned about amending the regulations to substitute redoximorphic features in place of a seasonal high water table. They suggested that the definition of redoximorphic features is more inclusive and may define the limiting zone outside the definition of seasonal high water table only.

The Department responded by indicating that terminology defined in the Act 537 would be restricted from any amendment. The committee invited PSMA and PAPSS to suggest language to be used for the regulation.

On behalf of the committee, Chairperson Mowery stated that the committee's comments on the draft Chapter 71, 72, and 73 proposal will be forwarded to Secretary Quigley. Any person wishing to have additional time to submit comments is encouraged to do so during the full public comment period.

New Business:

Comment on the Sewage Facilities Planning Application Mailer (Section 2e)

Greg Marshall suggested that Section 2e is an archaic method for locating a property site by requiring specification of the appropriate USGS quadrangle topographical map. He suggested that the internet has online programs that eliminate the need for submitting a USGS quadrangle topographical map.

Public Comments Concerning Committee Business:

Michelle Tate, Executive Director of the Citizens Advisory Council, stated that the CAC conducted a survey of approximately 25 advisory committees including the SAC. The purpose of the survey was to receive feedback from committee heads on how to more effectively and efficiently conduct advisory committees. The CAC anticipates providing the Department its findings and recommendations from the survey.

The CAC also provided an itemized list of transition recommendations to Governor Wolf and Secretary John Quigley. Among the items was CAC's interest in promulgating an amendment to

the regulations allowing alternate technologies during planning and the possibility of amending Act 537.

Meeting Adjournment

The meeting was adjourned at approximately 12:04 pm.

Appendix

Upon request of the Committee at the March 22, 2016 advisory committee meeting, comments on the proposed regulations forwarded to Secretary John Quigley are shown as Appendix 2 and 3.

Appendix 1

BYLAWS OF THE PENNSYLVANIA SEWAGE ADVISORY COMMITTEE

AMENDED

SEPTEMBER 18, 1996 MARCH 30, 2005 OCTOBER 5, 2005 Month Day, 2016

Bylaws The Pennsylvania Sewage Advisory Committee

AUTHORIZATION:

Section 4 of the Act of January 24, 1996, P.L. 1535 as amended, the Pennsylvania Sewage Facilities Act

Advisory Committee An advisory committee shall be appointed within three months of the passage of this act and biennially thereafter, membership which shall be composed of one representative from the following organizations, the name of said representative to be submitted to the secretary of the Department of Environmental Protection, hereafter the Department, within ten days of receipt of request for same: Pennsylvania State Association of Township Supervisors, Pennsylvania State Association of Boroughs, Pennsylvania League of Cities and Municipalities, Pennsylvania State Association of Township Commissioners, Pennsylvania State Association of County Commissioners, Pennsylvania Association of Plumbing, Heating, and Cooling, Contractors, Inc., Pennsylvania Society of Professional Engineers, Mortgage Bankers Association, Pennsylvania Builders Association, Pennsylvania Society of Architects, Local Health Agencies, The Pennsylvania State University, Pennsylvania Municipal Authorities Association, Pennsylvania Section of the American Water Works Association, Water Pollution Control Association of Pennsylvania, American Society of Civil Engineers, Pennsylvania Environmental Health Association, USDA Rural Development, Consulting Engineers Council of Pennsylvania, National Association of Water Companies, Pennsylvania Vacation Land Developers Association, United States Department of Housing and Urban Development, Governor's Policy Office, Department of Community and Economic Development, American Planning Association, General Contractors Association of Pennsylvania, Pennsylvania Environmental Council, Inc., Pennsylvania Bar Association, Pennsylvania Association of Realtors, Pennsylvania Association of Sewage Enforcement Officers, Pennsylvania Landowners Association, Inc., Pennsylvania Society of Land Surveyors, and such other organizations having a direct interest in the area of water and sewage as the Secretary deems necessary.

AUTHORIZATION:

Section 4 of the Act of January 24, 1996, P.L. 1535 as amended, the Pennsylvania Sewage Facilities Act.

An advisory committee shall be appointed within three months of the passage of this act and biennially thereafter, membership of which shall be composed of one representative from the following organizations, the name of said representative to be submitted to the secretary within ten days of receipt of request for same: Pennsylvania State Association of Township Supervisors, Pennsylvania State Association of Boroughs, Pennsylvania League of Cities, Pennsylvania State Association of Township Commissioners, Pennsylvania State Association of County Commissioners, Pennsylvania Association of Plumbing, Heating, Cooling, Contractors, Inc., Pennsylvania Society of Professional Engineers, Mortgage Bankers' Association, Pennsylvania Builders Association, Pennsylvania Association of Realtors, Pennsylvania Landowners Association, Pennsylvania Society of Architects, County Health Departments, Pennsylvania State University, Pennsylvania Municipal Authorities Association, Pennsylvania Section of the American Water Works Association, Water Pollution Association of Pennsylvania, American

Society of Civil Engineers, Pennsylvania Environmental Health Association, Farmers Home Administration, Consulting Engineers Council of Pennsylvania, National Association of Water Companies, Pennsylvania Vacation Land Developers Association, United States Department of Housing and Urban Development, Pennsylvania Department of Community Affairs, Office of State Planning and Development, Pennsylvania Bar Association, and such other organizations having a direct interest in the area of water and sewage as the secretary deems necessary.

Compiler's Note: The Department of Commerce, referred to in subsec. (a), was renamed the Department of Community and Economic Development by Act 58 of 1996. The Department of Community Affairs, referred to in subsec. (a), was abolished by Act 58 of 1996 and its functions were transferred to the Department of Community and Economic Development.

1. PURPOSE

The committee shall have the opportunity to review proposed rules, regulations, standards and procedures and shall review existing rules, regulations, standards and procedures of the Department pursuant to this Act. This will afford the regulated community and stakeholders the opportunity to participate in the development of such documents. The recommendations of the advisory committee shall be submitted to the Secretary who shall give due consideration to the same.

2. MEMBERS

- a. The members of the committee shall be appointed by their member organizations in writing to the Secretary and Chairperson for a two-year term beginning on April 1 of an odd numbered year and ending two years later on March 30.
- b. Should a committee member resign from his/her appointment, the member organization shall designate a new member to complete the unexpired term.
- c. Committee members shall not receive any compensation for their services but shall be reimbursed by the Department for their actual and necessary travel and subsistence expenses incurred in the performance of their duties.

3. ALTERNATES

- a. The alternate members of the committee shall be appointed by their member organization in writing to the Secretary and Chairperson for a two-year term beginning on April 1 of an odd numbered year and ending two years later on March 30.
- b. In the event that a committee member cannot attend a scheduled business meeting, he the member shall arrange with his/her their organization for his the duly appointed alternate to serve in his the member's absence.
- c. Alternates shall be appointed for a two-year term and shall not receive any compensation from the Department for their services but shall be reimbursed for their actual and necessary travel and subsistence expenses incurred in the performance of their duties when attending in the absence of a member.
- d. While serving in the absence of an appointed committee member, said alternate shall have the authority to perform the duties and exercise the powers of the appointed member and shall be entitled to one vote in person on all matters as shall come before the committee.

4. OFFICERS

a. The officers of the committee shall be a Chairperson, Vice-Chairperson, and such other

officers as the committee may from time to time elect.

- b. It shall be the duty of the Chairperson to preside at all meetings of the committee, call special meetings, appoint subcommittee Chairpersons with the consent of the committee, and perform such other duties as pertain to the office.
- c. It shall be the duty of the Vice-Chairperson to perform the duties of the Chairperson in the absence of that Chairperson, and assist the Chairperson in the performance of such duties as may be assigned by the Chairperson.

5. DEPARTMENT RESPONSIBILITIES

The responsibility of the Department is to provide program and administrative support to the committee. This support includes framing issues for the committee and providing the necessary information for committee discussions; assisting in the development of agendas and meeting schedules; providing input into organization nominees for the committee. Administrative support includes transcribing, mailing and maintaining a permanent record of meeting minutes, transmitting mailing agendas and materials to committee members prior to meetings via email, posting agendas, handouts and meeting minutes on the DEP World Wide Web website, and the review and approval of travel and subsistence expenses for committee members.

With respect to the development of regulations, the Department will provide timely briefings and consult with the appropriate advisory committee on regulations prior to Environmental Quality Board (EQB) consideration. For proposed regulations, the Department will involve the committee early in the drafting stage of proposed regulations. For final regulations, the Department will report to the committee on the extent and nature of comments and involve the committee in decisions to use the Advance Notice of Final Rulemaking procedure or to proceed with regulatory negotiation.

The Department will provide catered lunches when it is anticipated that the meeting will extend beyond 1 p.m.

6. ELECTION AND TERMS OF OFFICE

- a. The officers of the committee shall be elected by ballot at the regular meeting of the committee specified for that purpose in the bylaws, and shall hold office for a term of two years or until successors are elected.
- b. Prior to the end of the year preceding a required election, the Chairperson shall appoint a nominating committee of three members from the committee who shall prepare a list of nominations for the offices of Chairperson and Vice-Chairperson. The consent of the candidates named must be obtained before the nominations are presented. The name of those nominees by office shall be distributed to all members of the committee at least two weeks prior to election. Additional nominations to either office may also be made from the floor at the time of the election.

c. In the event that there is no election due to the lack of a quorum, election of officers may take place by mail ballot, and existing officers will continue to serve until the results of that ballot are known. Prior to mailing election ballots, the Nominating Committee should by mail give each member the opportunity to nominate additional members for office. If a member receives two or more nominations, his or her name shall be placed on the mail ballot. The consent of all nominees must be obtained before placing their names on the ballot. The Chairperson of the Nominating Committee shall present the slate of nominees to the Chairperson, who shall instruct the Department to prepare a mail ballot containing the names of the nominees and to mail the same to all appointed members. The Chairperson shall set the date for the return and counting of the mail ballots.

7. MEETINGS

- a. The committee Chairperson shall meet at least two times a year and at all other times at the call of the Chairperson. One meeting shall be held in mid-March and one meeting will be held in September unless a different meeting schedule is determined. every second year for the purpose of electing officers for the following year. Officers shall be elected in March of every second year. A second meeting shall be held in November unless a different meeting schedule is determined to be necessary by the Chairperson.
 - 1) A schedule of meetings should be a joint decision between the advisory committee officers and the Department. Considerations include statutory mandates, number, variety and complexity of issues facing the committee and the availability and amount of program support provided by the Department.
 - 2) Notice of advisory committee meetings will follow requirements of Management Directive 250.1 Amended and the Department's Directive on Sunshine Act Meeting Notices.
- b. A schedule of meetings for each calendar year shall be submitted in December on Form STD-5, as revised, titled The Sunshine Act Meeting Notices, to the Office of Administration, Bureau of Management Services (BMS) and to the Department's Office of Policy and Communications.
- c. Upon receipt of a written request for a meeting from at least one-third of the members, the Chairperson shall, within two weeks of receipt of the request, schedule a meeting of the committee for the purpose of conducting the business of the committee.
- d. One third of the members appointed to the committee shall constitute a quorum. A quorum for the purposes of voting shall be determined by the number of members present at the beginning of the meeting. The vote of members present at the beginning of the meeting but absent during a vote shall be tallied as "present, but not voting."

8. SUBCOMMITTEES

The Chairperson shall appoint such subcommittees as deemed necessary by the committee in

order to carry out its duties and responsibilities. The Chairperson shall appoint the Chairperson of each subcommittee. Subcommittees shall make recommendations to the full committee for its consideration and action

9. PARTICIPATION BY NON-MEMBERS

When non-members of the committee want to be included on a meeting agenda, they shall be required to submit a request to the Chairperson with a copy to the Department at least three weeks prior to the meeting. Such participation shall be limited to individuals whose interests are not represented by organizations currently on the committee. Participation shall be limited to a 10-minute segment per participant scheduled for the end of each meeting as "public participation."

10. AMENDMENTS

These bylaws may be amended, repealed or suspended at any meeting of the committee by twothirds vote of the members of the committee present at the meeting, provided that written notice of such amendment or repeal shall have been sent by the Department on behalf of the committee to each member at least two weeks prior to said meeting.

11. PARLIAMENTARY AUTHORITY

On items not covered by these bylaws, Robert's Rules of Order shall be the final authority.

Appendix 2

Pennsylvania Sewage Advisory Committee

April 6, 2015

John H. Quigley, Acting Secretary Department of Environmental Protection Rachel Carson State Office Building P.O. Box 8774 Harrisburg, PA 17105-8774

Dear Secretary Quigley:

The Sewage Advisory Committee (SAC) was recently afforded the opportunity to review and comment on the proposed revisions to Chapters 71, 72 and 73 of Title 25 of the PA Code. These revisions were ostensibly proposed solely to support the usage of proven onlot sewage treatment and disposal technologies not currently contained in the regulations (otherwise known as alternate sewage systems) for the purpose of new land development planning (NLDP).

SAC has provided comments to all suggested revisions proposed by Department staff even though it appears that the scope of proposed changes goes well beyond those necessary to accomplish the purpose described above. We encourage the Department to carefully consider the need for any proposed revision at the current time that does not directly support the process of allowing alternate onlot sewage systems to be used for NLDP. While many of the proposed revisions not needed to support NLDP have merit, in consideration of limited Department resources and in the interest of timely advancement of a process that all parties have agreed needs to be expedited, we suggest that they be part of a future, and more comprehensive, revision to the regulations.

Attached for your consideration are the comments that have been approved by the Committee and have been previously submitted through the SAC liaison to Department staff who have been assisting in our review. Due to the volume of documents, the enclosed CD has been provided to minimize unnecessary paper consumption.

Thanks to Department staff for making themselves available to the Committee to answer questions and for assistance during development of comments. We look forward to continued dialogue in preparation for submittal of our report to the EQB.

Respectfully,

Duane Mowery

SAC Chairperson

P.O. Box 410

Newburg, PA 17240

Enclosures (including CD)

C: John Diehl, Sewage Advisory Committee liaison (CD documents in electronic form)

Appendix 3



April 13, 2015

John H. Quigley, Acting Secretary Department of Environmental Protection Rachael Carson State Office Building P.O. Box 8774 Harrisburg, PA 17105-8774

RE: PAPSS Comments and Recommendations on DEP Proposed Revisions to

Chapters 71, 72 and 73 of the Sewage Facilities Regulations

Dear Secretary Quigley,

As a result of discussions at the March 24, 2015, Sewage Advisory Committee (SAC) meeting, the Pennsylvania Association of Professional Soil Scientists (PAPSS) was requested to provide supplemental recommendations on the proposed revisions to Chapters 71, 72 and 73 of Title 25 (the Sewage Facilities Regulations) with respect to those sections referring to soil science. The recommendations support the objective of allowing the use of approved alternate sewage system technologies in new land development planning. The following comments provide recommendations in each chapter to include more accurate terminology and procedures with associated definitions. PAPSS also provided supporting rationale to explain the recommendations where appropriate.

PAPSS hopes these comments and recommendations will assist the Department of Environmental Protection (DEP) in preparing the proposed final draft revisions to the sewage facilities regulations. We thank you for the opportunity to provide our soil science recommendations and look forward any assistance we can provide in the future development of these regulations. Please do not hesitate to contact us if anyone has any questions.

Sincerely, Bruce P. Willman

Bruce P. Willman. CPSS - PAPSS Representative to SAC

cc: Duane Mowery, Chairman, Sewage Advisory Committee (via email) John Diehl, PADEP Chief, Act 537 Management Section (via email)



