

HB624 Amendment EEEE.pdf

Uploaded by: Marlon Amprey

Position: FAV



HB0624/833626/1

AMENDMENTS
PREPARED
BY THE
DEPT. OF LEGISLATIVE
SERVICES

22 MAR 23
14:08:53

BY: Delegate Amprey
(To be offered in the Education, Energy, and the Environment
Committee)

AMENDMENTS TO HOUSE BILL 624

(Third Reading File Bill)

AMENDMENT NO. 1

On page 1, in line 3, after the first “of” insert “altering the list of entities to which a supplier of water must give a certain notice;”.

AMENDMENT NO. 2

On page 2, in line 5, strike “and”; and in the same line, after “centers” insert “, AND LOCAL HOSPITALS”.

HB624 Written Testimony - EEE.pdf

Uploaded by: Marlon Amprey

Position: FAV

MARLON AMPREY
Legislative District 40
Baltimore City

DEPUTY MAJORITY WHIP

Economic Matters Committee



The Maryland House of Delegates
6 Bladen Street, Room 315
Annapolis, Maryland 21401
410-841-3520 · 301-858-3520
800-492-7122 Ext. 3520
Marlon.Amprey@house.state.md.us

THE MARYLAND HOUSE OF DELEGATES

ANNAPOLIS, MARYLAND 21401

March 30, 2023

Testimony of Delegate Marlon Amprey in support of HB 624: Suppliers of Water - Notification Requirements

Dear Chair Feldman and Members of the Education, Energy, and the Environment Committee,

Water-borne illness from contaminated drinking water persists as a public health issue despite the existence of technology to test and treat water. A primary reason for this is delayed notification to the public of potential water contamination. Unfortunately, the current public notification requirements in Maryland have resulted in residents not being notified about water contamination for several days. Because every day that goes by between the first indication of water contamination and public notification puts innocent residents at risk for contracting a water-borne illness, it is imperative that Maryland bridges the information gap between suppliers of water and the public in order to prevent illness and death.

The goal of HB624 is to decrease the amount of time between the first sign of water supply contamination and public notification. HB624 requires all suppliers of water to notify the Department of the Environment and residents affected through at least one means of notification upon first signs of water contamination and provide non-collegiate educational institutions, public schools, family child care homes, and child care centers with written notice. Additionally, this bill requires water suppliers that serve more than 3,300 customers to provide notice through at least three means of communication. If there is a confirmed positive test for E. Coli in the water system, this bill requires the water supplier to give notice to the Department of the Environment and the Maryland Department of Emergency Management in addition to immediately preparing to issue a boil water advisory. This bill also requires that water suppliers (1) provide notice no later than 24 hours after a violation occurs that has the potential to have serious adverse effects on human health as a result of short-term exposure, (2) directly deliver notice to each person served in the system within 30 days of learning of a violation that has the potential for long-term health effects, and (3) provide notice to each person served by the water system within 1 year of learning of all other violations. Lastly, HB624 requires that each community water system and nontransient noncommunity water system test the water for methyl tertiary butyl ether and notify the persons regularly served by the water system and certain institutions if the levels exceed the State advisory level.

An amendment was submitted to add local hospitals to the list of institutions that water suppliers must provide written notice to upon first indication that the water supply is not up to standards.

With these requirements, residents and institutions will be provided adequate notice regarding water quality and safety to protect themselves.

I urge a favorable report on House Bill 624.

Respectfully,

A handwritten signature in black ink, appearing to read "Marlon Amprey". The signature is written in a cursive style with a large initial "M" and a distinct "A".

Delegate Marlon Amprey
40th Legislative District - MD

Testimony for Senate Hearing on HB0624 .docx.pdf

Uploaded by: Taylor Smith-Hams

Position: FWA

March 30, 2023

Environment - Suppliers of Water - Notification Requirements (HB0624)

Position: FAVORABLE WITH AMENDMENT

Dear Chairman Feldman and Members of the Education, Energy, and the Environment Committee,

The undersigned organizations write to offer strengthening amendments for Environment - Suppliers of Water - Notification Requirements (HB0624). While this legislation aims to improve communication to the public about drinking water contamination, it does not go far enough and will not address key gaps in current policy that exacerbated a public health crisis in West Baltimore last year.

On Labor Day, Baltimore City residents awoke to confusing and incomplete messages on social media about potential *E. Coli* contamination in their drinking water. *Escherichia coli* (*E. coli*) are bacteria commonly found in the intestines and feces of people and animals. Some strains of *E. coli* can cause intestinal infections, urinary tract infections, meningitis, septicemia, and other illnesses.¹ Small children and the elderly are most vulnerable to *E. coli*.

At 7:43am on Monday, September 5th, the Department of Public Works (DPW) tweeted that water at a police station and fire station in West Baltimore had tested positive for *E. Coli*.²



WATER SAMPLING NOTICE: DPW has sampled several locations in City Council District 9: 1503 W. Lafayette Ave. (Fire Dept. Engine 8) and Police facilities at 1034 N. Mount St, 920 N. Carey St where total coliform, E.coli contaminants have been identified in the water.
(Read thread)

7:43 AM · Sep 5, 2022

318 Retweets 113 Quote Tweets 212 Likes

Four minutes later, DPW tweeted that “residents may want to consider boiling any water used from faucets.”³



Residents may want to consider boiling any water used from faucets. DPW will be in the area distributing water as needed today, Monday, Sept. 5., and will provide frequent updates.

7:47 AM · Sep 5, 2022

104 Retweets 76 Quote Tweets 82 Likes

¹ Water Science School. (5 June 2018). [Bacteria and E. Coli in Water](#). U.S. Geological Survey.

² Baltimore City Department of Public Works [@BaltimoreDPW]. (5 Sept 2022). “[Water Sampling Notice](#).” *Twitter*.

³ Baltimore City Department of Public Works [@BaltimoreDPW]. (5 Sept 2022). “[Residents may want to consider boiling any water...](#)” *Twitter*.

The Department shared a few more tweets about sites where residents could collect jugs of clean water and then went silent for **over nine hours**, leaving residents of the immediately affected area, all of Baltimore City, and many surrounding communities wondering what was happening. Baltimore City officials did not provide a press release about the *E. Coli* contamination or issue a boil water advisory until 4:38pm that evening.⁴

Later, DPW revealed that the first test for *E. Coli* came back positive at 11:30am on Saturday, September 3rd – **two days** before any information was communicated to the public. A second test confirming the contamination came back positive on Sunday, September 4th at 9am.⁵ City and Maryland Department of the Environment employees were apparently informed immediately when the second test came back positive, but that information was not provided to potentially impacted residents until those early morning tweets the next day (along with a few messages posted on NextDoor and flyers handed out to some residents door-to-door).⁶

In contrast, when a water main break reduced water pressure in northern Baltimore County last month, DPW issued a press release and a precautionary boil water advisory the following evening – even though no *E. coli* or other contamination had been detected.⁷ We are glad to see that residents of Baltimore County received information about potential contamination in their drinking water and were provided with timely, detailed instructions on how to take precautions while the water main was repaired. However, the stark difference in communication to the public about actual *E. coli* contamination and reduced water pressure with the potential to lead to contamination invites scrutiny, particularly given the demographic differences between West Baltimore and northern Baltimore County.

We hope that DPW learned valuable lessons from its poor handling of the September 2022 *E. coli* crisis in West Baltimore, leading to prompt and more thorough messaging in Baltimore County five months later. But it is not lost on us that predominantly Black and poor residents of West Baltimore were deprived of critical public health information in a timely manner after dangerous bacteria were positively identified in their water, while their wealthier, whiter counterparts in the County were warned much earlier about the *potential* for contamination.

This bill aims to improve communication about future drinking water contamination to prevent repeats of the mistakes made in September by requiring water suppliers to use at least three methods to communicate with the public and expanding the forms of communication to include text messages and robocalls. Hopefully these changes will reduce the likelihood that a supplier will rely so heavily on social media in the future; however, they will not address a key issue exposed during the 2022 *E. coli* crisis in Baltimore City: the timeliness of a boil water advisory.

Currently, water suppliers are not required to notify the public about *E. coli* or other contaminants in their drinking water until a second test verifies the positive result. We believe that residents have the

⁴ Baltimore City Department of Public Works. (5 Sept 2022). "[DPW Issues Boil Water Advisory for Parts of West Baltimore.](#)"

⁵ Baltimore City Council Rules and Legislative Oversight Committee. (15 Sept 2022). [Informational Hearing - 2022 Labor Day Weekend E. Coli Positive Tests and Baltimore City Government's Response.](#)

⁶ Emily Opilo, Christine Condon & Scott Dance. (6 Sept 2022). [Frustration builds over Baltimore E. coli contaminated water as day passes without updates.](#) *The Baltimore Sun.*

⁷ Baltimore City Council Rules and Legislative Oversight Committee. (14 Feb 2023). [Baltimore City Department of Public Works \(DPW\) Issues a Precautionary Boil Water Advisory for Northern Baltimore County Residents and Businesses Impacted by 20-inch Water Main Break.](#)

right to know about ANY positive test for bacteria or other contaminants in their drinking water as soon as they are discovered. That is why we recommended to your colleagues in the House that this bill include an amendment requiring the issuance of a precautionary boil water advisory within 2 hours of the first positive *E. coli* detection. While the House adopted several amendments to the bill, they do not address the key issue of timely public notification.

The amendment on page 3, line 13 that includes the term "confirmed" is confusing, and that term must be defined within the scope of this bill. **The spirit of the bill is to provide timely and adequate notification to residents upon the first discovery of bacteria contamination by a water supplier. Therefore, if the intent of including the term "confirmed" is to delay this notification until a second test confirms the first, this is antithetical to the purpose of the bill and the amendment should be withdrawn.**

Similarly, an amendment on page 3, lines 17-19 adds a requirement for water suppliers to "immediately begin preparations for a boil water advisory," but not to actually issue one within a specific time frame. Again, this language continues to allow for unnecessary delays in notification and should be further amended to require water suppliers to immediately issue a boil water advisory upon the first indication of bacteria contamination to the water supply.

We understand that there are concerns about false positives, but the priority when it comes to public health should always be precaution. Public officials should trust their constituents enough to provide us with timely information that impacts our health so that we can take any precautions we deem fit while secondary tests are completed and verified. The common retort that sharing preliminary positive results could lead to "panic" is, frankly, offensive and paternalistic. When the City bungled the response to the *E. coli* crisis in September, it was residents who stepped up to keep their neighbors safe by distributing water, information, and other forms of mutual aid. Given the complete breakdown in communication in Baltimore in September, it is clear that early and often communication must be the practice going forward.

The September 2022 drinking water crisis in West Baltimore was a stark reminder of the systemic problems with Baltimore's water infrastructure that stem from decades of inequitable infrastructure investments and environmental racism. While the work to rebuild, repair, and maintain Baltimore's water infrastructure is a long-term project, we must ensure that residents have access to timely and detailed information about the quality of their drinking water now. This bill, with our suggested amendment, will improve notification requirements to ensure that residents do not have to wait days to find out about potential contamination and are instead empowered with information so they can take steps to proactively protect themselves and their families while additional testing is conducted.

We urge a favorable report on HB0624 with these amendments.

Sincerely,

Blue Water Baltimore
Clean Water Action
Food & Water Watch
Waterkeepers Chesapeake

MDE HB0624 FWA.pdf

Uploaded by: Tyler Abbott

Position: FWA



The Maryland Department of the Environment
Secretary Serena McIlwain

HB0624

Environment - Suppliers of Water - Notification Requirements

Position: Support with Amendments

Committee: Environment & Transportation

Date: March 23, 2023

From: Gabrielle Leach

The Maryland Department of the Environment (MDE or the Department) **SUPPORTS** House Bill 624 **WITH AMENDMENTS**. This bill would change public notification requirements and add certain requirements that are specific to E. coli. House Bill 624 would do the following:

- Amends the acceptable means of notification to add the following methods: text message, robocall, or “any other means acceptable to the Department.”
- Requires a supplier of water that serves at least 3,300 customers to issue notification through at least three (3) of the approved methods (radio, TV, newspaper, written notice, text message, robocall, or any other means approved by the Department).
- Suppliers of water that serve less than 3,300 may only use one of the approved methods of notification.
- Requires each supplier of water to notify the Department and the Maryland Department of Emergency Management (MDEM) if there is a positive test for E. coli in the system; and
- Upon receipt of notice, the supplier of water shall immediately begin preparations for issuing a boil water advisory.

MDE has been working with the sponsor on the following amendments to ensure consistency with federal requirements.

Proposed Amendments:

1. On the House side, MDE had asked that systems that served over 3,300 or greater only be subject to the “at least three means of notification.” The purpose of the amendment was so that smaller systems (such as a gas station) would only have to use one method of notification as required under federal law. However, as the bill was amended, smaller public water systems could use any of the seven listed notice methods, including text messages or robocalls, as their sole method of notification. This would conflict with the federal Safe Drinking Water Act as robocalls and text messages are not permissible forms of notification. See, e.g., 40 CFR § 141.203(a) (listing Tier II situations), (c) (minimum notification methods for Tier II violations); 40 CFR § 141.204(c) (minimum notification methods for Tier III violations). The Bill could be amended to address these issues and clarify that federal standards continue to apply by amending subsection (c) to provide that Envir. § 9-410 establishes minimum notification requirements that the Department may exceed.

Contact: Gabrielle Leach, Deputy Director of the Legislation and Intergovernmental Affairs
410-260-6302 (Annapolis Office), 410-453-3235 (cell), Gabrielle.Leach@maryland.gov

- a. Amendment:
 - i. (c) By rule or regulation, the Secretary shall adopt ~~notice~~ requirements to meet **OR EXCEED** the requirements of this section.
 - ii. The amendment could also include the words “and ensure conformity with the Safe Drinking Water Act” or something similar at the end of the sentence to address any concerns that the Department may establish requirements that exceed federal standards. This would be an improvement to existing law and protect the State’s primacy under the Safe Drinking Water Act.

2. HB0624 does not address enforcement gaps in existing law that exempt violations of public notice requirements from civil penalties. See, e.g., Envir. § 9-413(a) (imposing civil penalties for “willful” violations of Envir. § 9-412(a)(4) or (5)) As such, violations of Envir. § 9-410 and any rule that is not a primary drinking water regulation—including any rule to implement the Bill’s provisions—are not subject to civil penalties.
 - a. Amendment:
 - i. On page 1, after line 21, insert:
“BY repealing and reenacting, with amendments, Article - Environment Section 9-413(a) Annotated Code of Maryland (2014 Replacement Volume and 2022 Supplement)”.
 - ii. On page 4, after line 16, insert:
“9-413. (a) A person who willfully violates § 9-412(a)(4) or (5) of ANY PROVISION OF THIS SUBTITLE OR ANY ORDER, REGULATION, OR PLAN ADOPTED OR ISSUED UNDER this subtitle is subject to a civil penalty of up to \$5,000 for each day on which the violation exists.”.

3. A drinking water MCL violation for E. coli is based upon a two-sample set (initial and confirmed sample results) collected from a water distribution system, but the violation may be based on two E coli detections, or a combination of E. coli and total coliform detections. As currently written, the bill would only require notification to MDE and MDEM for E coli MCL violations that are based on two E coli detections, not on MCL violations that involve one total coliform detection and one E. coli detection. Furthermore, the term “in the system” is vague and could be interpreted as something other than, “in the distribution system,” which we believe is the intent.
 - a. Amendment: Each supplier of water is required to notify the Department and the Maryland Department of Emergency Management (MDEM) if there is a **confirmed** positive test for E. coli **or total coliform-positive repeat sample following an E. coli-positive routine sample** in the **distribution** system.

4. The Bill’s requirement to track 3-methods of notification for all violations, even when limited to systems serving more than 3,300 people, would include monitoring and reporting violations; this would be highly impactful. Violations for exceeding the maximum contaminant level for any chronic contaminant require public notification within 30 days; as such, notification by two additional

methods is not warranted. Violations for monitoring or reporting require public notification within one year; as such, notification by two additional methods is not warranted. Conversely, acute violations with a significant and immediate impact on human health (including E. coli, nitrates, and treatment technique violations for exceeding turbidity standards), require public notification within 24 hours. As such, 3-methods of public notification for the acute violations would improve timely critical notifications and protect public health while minimizing workload for both the Department and small water systems for less critical violations.

- a. Amendment: **Community water systems serving more than 3,300 customers must provide 3-methods of notification for acute (Tier 1) violations that have significant potential to affect human health, including E. coli, nitrates, and treatment technique violations for exceeding turbidity standards.**

For the reasons detailed above, MDE urges a **FAVORABLE WITH AMENDMENTS** report for HB 624.

2023-03-30 MAMWA Ltr HB 624.pdf

Uploaded by: Lisa Ochsenhirt

Position: UNF



Maryland Association of Municipal Wastewater Agencies, Inc.

Washington Suburban Sanitary Commission

14501 Sweitzer Lane, 7th Floor

Laurel, MD 20707

Tel: 301-206-7008

March 30, 2023

MEMBER AGENCIES

Allegany County
Anne Arundel County
City of Baltimore
Baltimore County
Town of Berlin
Cecil County
Charles County
City of Cumberland
D.C. Water
Frederick County
City of Hagerstown
Harford County
City of Havre de Grace
Howard County
Ocean City
Pocomoke City
Queen Anne's County
City of Salisbury
Somerset County Sanitary District
St. Mary's Metro. Comm.
Washington County
WSSC Water

The Honorable Brian J. Feldman

Chair, Education, Energy, and the Environment Committee

2 West, Miller Senate Office Building

Annapolis, MD 21401

Re: HB 624 (Environment – Suppliers of Water – Notification Requirements)

Dear Chairman Feldman:

On behalf of the Maryland Association of Municipal Wastewater Agencies (MAMWA), I am writing to share MAMWA's views on HB 624, which would, among other things, require that a water supplier immediately begin preparations for issuing a boil water advisory for a positive e.coli test in the system. MAMWA is a statewide association of local governments and wastewater treatment agencies that serve approximately 95% of the State's sewer population. Many Members also operate public water systems.

Nothing is more important to MAMWA Members who provide public drinking water than the health and safety of local customers. Members work hard every day to ensure full compliance with all applicable regulations while also providing excellent customer service at a reasonable cost. We agree with the intent behind HB 624. However, we are concerned that the proposed approach would be redundant or even inconsistent with the existing notification approach for the presence of e.coli in the distribution system. Specifically, under federal and state law, there are established steps that must be taken if a public water system pulls a sample that is positive for e.coli (including re-testing and notifying the Maryland Department of the Environment (MDE)). HB 624 would layer additional requirements on top of the existing protocols and could cause confusion as local water suppliers and MDE work together to notify customers and address any underlying issues with the distribution system. We respectfully request that the General Assembly consider whether it would be more appropriate to address this important issue either by adapting current practice or administratively.

Please feel free to contact me with any questions at Lisa@AquaLaw.com or 804-716-9021.

Sincerely,

Lisa M. Ochsenhirt, MAMWA Deputy General Counsel

GENERAL COUNSEL

AquaLaw PLC

cc: Education, Energy, and the Environment Committee Members, HB 624 Sponsor

HB 624 AACO Testimony.pdf

Uploaded by: Lisa Ochsenhirt

Position: UNF



Karen Henry, Director
2662 Riva Road, Suite 400
Annapolis, MD 21401
410-222-
pwhenr00@aacounty.org
www.dpwandyou.com

March 29, 2023

Senator Brian J. Feldman
Education, Energy, and the Environment Committee
2 West
Miller Senate Office Building
Annapolis, MD 21401

Dear Mr. Feldman:

Anne Arundel County Department of Public Works (DPW) respectfully submits the following testimony in opposition to HB 624. This bill addresses how and when water suppliers must notify individuals when a positive E. coli test is received. The health and safety of our residents is our top priority, and we strive to be open and transparent about the services we provide to our customers, and have well established procedures regarding notification should contamination occur.

The intent of HB 624 is in alignment with this goal. However, its implementation may be duplicative or in conflict with established Federal and State guidelines. These guidelines include established steps that must be taken if a public water system has a positive test for E. coli. Adding additional steps to this established procedure may cause confusion and unnecessary notification of residents before the public water supplier has confirmed that there is a contamination. We request that the General Assembly consider whether changes to this important concern be reviewed administratively by Maryland Department of the Environment instead of through legislation.

Sincerely,

/s/

Karen Henry
Director

HB0624-EEE-UNF.pdf

Uploaded by: Nina Themelis

Position: UNF



BRANDON M. SCOTT
MAYOR

*Office of Government Relations
88 State Circle
Annapolis, Maryland 21401*

HB624

March 30, 2023

TO: Members of the Senate Education, Energy, and the Environment Committee
FROM: Nina Themelis, Interim Director of Mayor's Office of Government Relations
RE: House Bill 624 – Environment – Suppliers of Water – Notification Requirement
POSITION: OPPOSE

Chair Feldman, Vice Chair Kagan, and Members of the Committee, please be advised that the Baltimore City Administration (BCA) **opposes** House Bill (HB) 624.

HB 624 would alter the means by which a supplier of water must give notice to the Department of the Environment (MDE) and certain individuals and entities under certain circumstances; require that a supplier of water use a certain minimum number of means to give the notice; require a supplier of water to give notice to MDE and the Maryland Department of Emergency Management (MDEM) if there is a positive test for E. coli in the system; require MDE and MDEM to immediately begin certain preparations on receipt of a notice of a positive test for E. coli in a public water system; and generally relating to public water systems and suppliers of water.

The City of Baltimore's water system is a regional supplier of drinking water to more than 1.8 million customers in Baltimore City and the surrounding region. Baltimore, Carroll, Howard, and Harford counties are all customers of the City's system. Baltimore County receives potable water from the City's system and these customers are billed directly by the City for their usage. Carroll County is a wholesale purchaser of raw water that they withdraw from the City's Liberty Reservoir, which they treat and distribute to their customers in the Freedom District. Howard County is a wholesale purchaser of the City's potable water that they distribute and bill directly to a portion of their residents. Harford County is a wholesale purchaser of raw water.

The City performs routine testing of the water distribution system to monitor the amount of chlorine residual in the distributed water and to test for the potential presence of bacterium. These tests are performed at 90 sampling points in the City and County. This sampling is in addition to the multiple daily and hourly testing performed at the filtration plants before the treated water enters the distribution system. Under the "Revised Total Coliform Rule" (RTCR), a water utility is required to notify MDE if there is a positive test for E. coli for a water sample taken within the distribution system. The test samples are required to "sit" for 24 hours to determine if there is any indication of bacterium growth. If the test is positive, MDE is notified. In addition, a second confirmation test is taken, the sample sits for 24 hours, and if the E. coli presence is confirmed, the City MUST notify MDE within 24 hours and a series of actions are taken to flush the system.

The water utility also notifies Baltimore City's Office of Emergency Management (OEM) whose staff coordinates the event with all City agencies and any affected county and State partners, including MDE. MDE, working with the City, defines the impacted area based on the City's sampling and testing data, and approves all public messaging before it can be released. Notification of affected customers is tailored to each event, and multiple means are used, including door-to-door outreach, social media, traditional media outlets, etc.

For the above reasons, the BCA respectfully requests an unfavorable report on HB 624.

HB0624-EEE_MACo_LOI.pdf

Uploaded by: Dominic Butchko

Position: INFO



House Bill 624

Environment - Suppliers of Water - Notification Requirements

MACo Position:

LETTER OF INFORMATION

Date: March 30, 2023

To: Education, Energy, & the Environment
Committee

From: Dominic J. Butchko

The Maryland Association of Counties (MACo) respectfully submits the following **letter of information** on HB 624. This bill sets certain parameters by which water suppliers must notify individuals should there be a positive E. coli test.

The health and safety of residents is the highest priority to any county. Counties, as owners and operators of critical infrastructure, are tasked with both supplying critical services and ensuring that those services do not harm their communities. Issues like water contamination are taken very seriously and have well established procedures for containment and appropriate notification. The clear intent of HB 624 is to uphold this same goal – to take this responsibility seriously and provide the impacted communities notification at the appropriate juncture.

While the intent of HB 624 is broadly aligned with existing policy, its implementation may in fact be duplicative of or in conflict with well-established and expert-driven practice.

Baltimore City best explains this duplication in their testimony,

“Under the ‘Revised Total Coliform Rule’ (RTCR), a water utility is required to notify MDE if there is a positive test for E.coli for a water sample taken within the distribution system. The test samples are required to ‘sit’ for 24 hours to determine if there is any indication of bacterium growth. If the test is positive, MDE is notified. In addition, a second confirmation test is taken, the sample sits for 24 hours, and if the e.coli presence is confirmed, the City **MUST** notify MDE within 24 hours and a series of actions are taken to flush the system. The water utility also notifies Baltimore City’s Office of Emergency Management (OEM) whose staff coordinates the event with all City agencies and any affected county and State partners, including MDE. MDE, working with the City, defines the impacted area based on the City’s sampling and testing data, and approves all public messaging before it can be released. Notification of affected customers is tailored to each event, and multiple means are used, including door-to-door outreach, social media, traditional media outlets, etc.”

The major concern is that provisions within HB 624 would serve to either complicate this system, or inadvertently lead to premature notification of a contamination. Counties by no means argue with the intent of HB 624 but suggest that provisions within this bill may be better folded into existing practice or may be more appropriate to change administratively. MACo remains available to the committee should they have any further questions or desire additional information.