Small systems get help in meeting VA, ERP requirements

by Jill A. Ross
E-train Editor

In addition to maintaining their facilities and ensuring a steady supply of clean, safe drinking water for citizens, small water systems across the country have additional responsibilities to deal with this year—meeting the security requirements of the “Public Health Security and Bioterrorism Preparedness and Response Act of 2002.”

All water systems serving 3,300 to 50,000 residents were required to perform and submit a vulnerability assessment (VA) to the U.S. Environmental Protection Agency (EPA) by June 30, 2004. With this deadline behind them, small systems are now turning their attention to the next requirement under the Bioterrorism Act—developing or updating an emergency response plan (ERP) that incorporates the results of the VA. Under the new law, systems must submit a certification that they have developed or updated their ERP within six months after completing their VA.

“EPA has been working with states and partner organizations to provide systems with a variety of tools and assistance to help them meet these requirements,” says Andrew Bielanski, an environmental engineer and small systems expert with EPA’s Water Security Division.

Small systems face challenges

More than 8,400 community water systems are subject to the VA and ERP requirements under the Bioterrorism Act—most of these being small systems.

Deadlines for VA and ERP certification submission for the approximately 460 large systems and the approximately 450 medium-sized systems have passed. According to Bielanski, large water systems had a 100 percent submission rate for VAs and a 99 percent submission rate for ERP certifications, while medium-sized systems had a 97 percent submission rate for VAs. At press time, the submission rate for ERP certifications for medium-sized systems was unavailable.

According to Bielanski, EPA is seeking a 100 percent compliance rate with the Bioterrorism Act requirements.

EPA understands the challenges facing the approximately 7,500 small systems as they seek to emulate the high rates of compliance achieved by the larger systems, says Bielanski. The first challenge is the sheer number of small systems. “The number of water systems serving 3,300 to 50,000 residents jumps up dramatically,” he says. “There are more than nine times the number of systems in the small category as there is in the large and medium categories combined.”

Beyond the numbers challenge, Bielanski notes that not all small systems understand what needs to be done when it comes to undertaking a VA or an ERP, and they may not know where to look for assistance even though help is available.

To address these issues, EPA is completing a $1.5 million training effort targeted specifically to help small communities needing to meet this year’s VA and ERP deadlines. Five organizations—the Rural Community Assistance Program (RCAP), the National continued on page 4
NDWC offers free POU reverse osmosis training CD

Recent amendments to the Safe Drinking Water Act allow small communities to use centrally managed, point-of-use (POU) water treatment units to comply with national primary drinking water regulations. A new computer-based tool created by the Montana Water Center—Point-of-Use Reverse Osmosis, Complying with Arsenic Regulations in Small Drinking Water Systems—provides easy to understand training for public works engineers about POU reverse osmosis (POU RO) treatment for drinking water.

All aspects of POU RO are covered in seven units on the training CD, using arsenic treatment as an example. Quizzes are graded and tracked within the program. Water professionals may be able to obtain professional development credit or CEUs for successful completion of the activities.

Contact the National Drinking Water Clearinghouse to receive a free copy of this CD. Call (800) 624-8301, (304) 293-4191, or e-mail ndwc_orders@mail.nesc.wvu.edu and ask for Item #DWCDTR20. The CD is also available free online in multiple formats. Just visit the Environmental Protection Agency’s Technical Assistance Center Network Web site at www.tacnet.info/pouro.
**NETCSC’s regulations Web site updated**

The National Environmental Training Center for Small Communities (NETCSC) has updated its “Regulatory Update” Web site. Located at [www.nesc.wvu.edu/netcsc/netsc_regs.htm](http://www.nesc.wvu.edu/netcsc/netsc_regs.htm), this site provides a list of drinking water and wastewater rules, regulations, and policies that affect small communities. The revised site now includes links for more information about each regulation.

The “Regulatory Update” site describes applicable regulations; the size of communities affected; specific rules for different size communities; and current, upcoming, and future Safe Drinking Water Act and Clean Water Act regulatory dates. It also includes helpful contacts and sources for additional details about the regulations and a glossary of acronyms and important terms.

In addition, a hard copy of the regulations list, *Regulatory Update Reference Materials Condensed Chart*, is also available. This document summarizes the regulations information on NETCSC’s Web site in a simple matrix format.

To request a copy of this chart, call NETCSC at (800) 624-8301 or (304) 293-4191 and request Item #TRBLRG02. The chart costs $1.60 plus shipping and handling charges.

**New NETCSC catalog online**

The National Environmental Training Center for Small Communities’ (NETCSC) new 2004 Environmental Training Resources Catalog is now available on NETCSC’s Web site located at [www.netc.wvu.edu](http://www.netc.wvu.edu). The catalog provides full descriptions of more than 125 NETCSC products for use in all phases of training—from needs assessment to delivery and evaluation.

The catalog details free or low-cost training packages, training aids, and training-related information in the following topic areas: environmental management, drinking water and wastewater, drinking water, wastewater, solid waste, and training/adult education. An order form is included.

To place an order, call NETCSC at (800) 624-8301 or (304) 293-4191, fax (304) 293-3161, or e-mail netc_orders@mail.nesc.wvu.edu.

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**We want to hear from you!**

Thanks to the many readers who responded to our readership survey published in the Winter 2004 issue of *E-train*. If you have not returned your survey, it is not too late! We’d still love to hear from you. So fill in your survey and drop it in the mail—the postage is on us. Or fax your completed survey to (304) 293-3161.

If you don’t have a copy of the survey, just call us at (800) 624-8301 or (304) 293-4191 or send an e-mail to jillross@westco.net and we’ll send you a copy.

Thanks for sharing your thoughts on *E-train!*
EPA resources abound to help systems

The U.S. Environmental Protection Agency (EPA) has made many resources available to help water systems improve security and develop or update vulnerability assessments (VAs) and emergency response plans (ERPs).

Many documents can be accessed through EPA’s water security Web site (www.epa.gov/safewater/security). Just a few of the resources available include:

**Top Ten List: Water Supply Emergency Preparedness and Security for Law Enforcement**—This poster can be displayed in local municipal facilities to help coordination between law enforcement, water supply industry, and public health officials.

**Top Ten List for Small Ground Water Suppliers**—This list includes tips to help small public water suppliers protect their facilities from tampering or contamination incidents and to prepare for potential emergencies.

**Emergency Response Plan Guidance for Small and Medium Systems**—EPA has published this document for community water systems serving a population between 3,301 and 99,999 as they develop or revise ERPs. The document should be of considerable value to a number of key authorities with critical roles during emergency response or remediation actions from a drinking water contamination threat or incident.

**Model Emergency Response Guidelines**—This document provides uniform response, recovery, and remediation guidance for water utility actions in response to man-made and/or technological emergencies.

**Vulnerability Assessment Videos**—EPA’s Region 6 office has worked in cooperation with the Drinking Water Academy to develop two videos to help small systems understand the basic concepts of a vulnerability assessment. One video is for systems serving populations between 3,300 to 10,000 people, while the other video is for systems serving populations of 3,300 or fewer. A companion video about ERPs is currently in development.

Contact EPA’s Ken Hay at (202) 564-4619 or hay.ken@epa.gov to request copies of the videos. There is a small charge for shipping.

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Small systems get help in meeting VA, ERP requirements

*continued from page 1*

Rural Water Association (NRWA), the Water Environment Federation (WEF), the National Environmental Services Center (NESC), and the Maryland Center for Environmental Training (MCET)—trained more than 700 technical assistance providers and trainers who are now helping state, tribal, and local agencies to improve their security and ability to respond to emergency situations.

According to Bielanski, EPA also provided an additional $2 million to NRWA to help systems serving 3,300 to 10,000 people. This assures that technical assistance providers are available in all 50 states to help small systems with their VAs and ERPs.

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**Very small systems need help too**

But what about the very small systems—those serving fewer than 3,300 people? Although these systems are not required by law to submit VAs and ERP certifications to the EPA, the Bioterrorism Act requires EPA to provide guidance to these systems on VAs, ERPs, and addressing threats to the system.

EPA is currently developing a number of resources specifically for small systems. According to Bielanski, these resources will be accessible through EPA’s water security Web site when they become available later this year.

Bielanski notes that some states, such as Utah, are being especially proactive in their work assisting very small communities. (For more information about Utah’s efforts, visit www.drinkingwater.utah.gov/documents/board_minutes/resolution.pdf.)

**Grants, resources available**

EPA is also providing grants to states and territories to help with drinking water system security. States and territories are encouraged to apply for these opportunities.

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Need help preparing a VA or ERP? Call NESC . . .

If your community needs assistance in preparing a vulnerability assessment or emergency response plan, the National Environmental Services Center (NESC) can help. NESC has a list of more than 200 technical assistance providers located throughout the country who have been trained to help small systems increase their security capabilities. Please call Sandy Miller at NESC at (800) 624-8301 or (304) 293-4191, ext. 5536, and we’ll try to connect you with a technical assistance provider in your area.

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**Grants, resources available**

EPA is also providing grants to states and territories to help with drinking water system security. States and territories are encouraged to apply for these opportunities.
to use these grant funds for activities and strategies that would assist in implementing security enhancements and improving the readiness of individuals and groups involved in first response at drinking water systems. For more information about this grant program, visit www.epa.gov/ogwdw/security/finassistance.html.

Bielanski points out that EPA has a number of resources and self-assessment tools that can help systems of all sizes. These are available through EPA’s water security Web site located at www.epa.gov/safewater/security. (For additional information about some of these resources, see box on page 4.)

In particular, Bielanski recommends that systems refer to the Vulnerability Assessment Fact Sheet (located at www.epa.gov/safewater/security/vulntools.html) when trying to determine what goes into a VA and before selecting any tool to help them complete a VA. He also recommends that systems look at the “Security Product Guide” section of the Web site when making decisions about security improvements.

Finally, Bielanski offers the following advice for any systems that need help meeting the VA and ERP requirements: “Start local and then work up. Contact your state, the state RWA affiliate, RCAP, or NESC. There are lots of folks out there who are trained to help.”

### FEMA

**Deadline approaches for disaster mitigation plans**

Communities now have an additional incentive to prepare for an emergency—as of November 1, 2004, the Federal Emergency Management Agency (FEMA) will require all state and local governments to have disaster mitigation plans in place in order to be eligible for post-disaster assistance.

For more information about this requirement, visit www.fema.gov/fima/planning.shtm.

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**EPA offers information, advice for submitting VAs and ERPs**

All community water systems with a service population of 3,301 to 49,999 were required to conduct a vulnerability assessment (VA) of their facility and submit a copy of the VA and certification of submittal to the U.S. Environmental Protection Agency (EPA) by June 30, 2004. In addition, these systems are required to submit a certification to EPA within six months of submitting the VA that they have developed or updated their emergency response plan (ERP).

**Submission guidelines:**

- Please submit only the ERP certification, not the actual ERP.
- Please submit the VA and ERP certification using an express or courier service that provides tracking and certification of delivery (e.g., Federal Express, United Parcel Service, Airborne). Using these services will ensure that the submission is delivered directly to the persons authorized to receive and process these items.
- Please use the following address for express or courier service deliveries to EPA. This location is open for deliveries from 8:30 a.m. to 4:30 p.m. Eastern Time. Call the number below before attempting delivery outside of those hours.
  
  U.S. Environmental Protection Agency
  Water Resource Center (WSD-RAR)
  Room 1119 EPA Wester Building
  1301 Constitution Ave., NW
  Washington, D.C. 20004

  - Couriers are to use phone number 202-566-1729.

**For more information:**

- For more details regarding the statutory requirements, please visit www.epa.gov/safewater/security.
- Complete instructions on the VA submittal and ERP certification process are available at www.epa.gov/safewater/security/community.html.
- Information about EPA’s information protection protocol is available at www.epa.gov/safewater/security/agency.html.
- EPA is working with many partners to provide resources for all water utilities in the process of conducting a VA and creating or upgrading ERPs. Please visit www.epa.gov/safewater/security for more details regarding these resources.
NESC offers new security resources, links

The National Environmental Services Center (NESC) has created several new resources and added additional links to its Web site in an effort to help small water and wastewater systems deal with security concerns. To order any of these products, call NESC at (800) 624-8301 or (304) 293-4191, fax (304) 293-3161, or e-mail netc_orders@mail.nesc.wvu.edu. Visit www.netc.wvu.edu to access the security resource links.

Emergency Response Planning Resources for Small Water and Wastewater Utilities
Developed by the National Environmental Training Center for Small Communities

This document provides a list of emergency planning resources that will help small utilities, community leaders, and technical assistance providers to update, create, or improve emergency response plans (ERPs) as required by the “Public Health Security and Bioterrorism Preparedness and Response Act of 2002.” It identifies and describes a variety of ERP templates, guidance documents, training resources, Freedom of Information Act resources, general emergency response planning resources, and combined water/wastewater utility resources that small utilities will find helpful.

Item #TRBLGN25 . . . . . . . . . . . . . . . . . . . . . . $2.55

Due Diligence: Small Water System Security (Training Module)
Developed by the National Environmental Training Center for Small Communities

This is a new module in NETCSC’s training curriculum, Managing A Small Drinking Water System: A Short Course for Local Officials. It is designed to aid local officials in their leadership role in protecting community water utilities and the public health from security and other threats. The module provides information on addressing new regulations and securing local water systems. The information includes: identifying and understanding water system threats; complying with local, state, and federal laws; assessing vulnerabilities and securing the water system; being prepared to respond and recover from emergencies; and knowing administrative responsibilities and providing leadership. The module also provides information about security breaches and other man-made and natural threats to the utility; new regulations; procedures and tools to identify and prioritize vulnerabilities, secure the system, and prepare for emergencies; and policies, programs, and ordinances to put into place.

Contact Sandra Fallon at (800) 624-8301, ext. 5582, for price and availability.

Emergency Response Planning Pack
Developed by the National Drinking Water Clearinghouse

The NDWC compiled this selection of resources to help small communities prepare and update their ERPs. The package includes:

- Emergency Response Planning Guide for Public Drinking Water Systems developed by the Washington State Department of Health,
- Emergency Response Protocol Toolbox Overview: Planning for and Responding to Drinking Water Contamination Threats and Incidents developed by the U.S. Environmental Protection Agency,
- Emergency Response Planning Resources for Small Water and Wastewater Utilities developed by NETCSC,
- selected articles on security and emergency response planning, and
- a list of EPA regional and state contacts for drinking water security.

Item #DWPKOM59 . . . . . . . . . . . . . . . . . . . . . . $0.00

Supplemental Resources for Preparing for the Unexpected: Security for Small Water Systems
Compiled by the National Environmental Training Center for Small Communities

NETCSC has compiled the following resources to supplement its security-training curriculum, Preparing for the Unexpected: Security for Small Water Systems. Most of these resources have been developed or made available since the May 2003 publication of Preparing for the Unexpected. Each resource offers updated information and tools that small water system personnel, assistance providers, trainers, and others can use to comply with the continued on next page
“Public Health Security and Bioterrorism Preparedness and Response Act of 2002.”

Electronic formats of these resources are available through links provided at NETCSC’s Web site (www.netc.wvu.edu) and hard copies can be ordered from NETCSC. The hard copies are available individually, or as a collective package (distributed as Appendices K–P for the Preparing for the Unexpected training manual).

**Prefering for the Unexpected Appendices K–P (Hard Copy Package)**

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**Individual components include the following:**

**Addendum to the Instructions to Assist Community Water Systems in Complying with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002**—Developed by EPA’s Office of Water, this six-page document describes what a community water system must do to comply with the Bioterrorism Act, the deadlines based on system size, how to determine system size, how to submit the package to EPA, and whom to contact for more information. This is an addendum to EPA’s original guidance document, Instructions to Assist Community Water Systems in Complying with the Public Health Security and Bioterrorism Preparedness and Response Act of 2002.

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**Emergency Response Plan Guidance for Small and Medium Community Water Systems**—This EPA guidance document is designed to assist small and medium-sized community water systems in complying with the 2002 Bioterrorism Act. Specifically, it provides a model ERP in a suggested format as well as pertinent information to include in your community’s ERP. EPA notes that this document is only guidance, and that a different ERP may be mandated by individual states or be preferred by the individual utility.

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**Response Protocol Toolbox: Planning for and Responding to Drinking Water Contamination Threats and Incidents**—Developed by EPA, this toolbox is designed to help the water sector effectively and appropriately respond to intentional contamination threats and incidents. Organized in modular format, the toolbox can be of value to drinking water utilities, laboratories, emergency responders, state drinking water programs, technical assistance providers, public health and law enforcement officials. The modules include:

- Overview
- Water Utility Planning Guide
- Threat Management Guide
- Site Characterization and Sampling Guide
- Analytical Guide
- Public Health Response Guide, and
- Remediation and Recovery Guide.

All modules can be obtained in PDF format at EPA’s Water Infrastructure Security Web site (www.epa.gov/safewater/security) under “Emergency Response Tools.” Please note that only the Overview is offered as a NETCSC product.

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**Emergency Response Planning Resources for Small Water and Wastewater Utilities**—Please see description of this resource on page 6.

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<th>Item #TRBLGN25</th>
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**Security and Emergency Planning Resources for Small Water and Wastewater Systems**—This NETCSC document provides a list of 14 security resources that are available to small water and wastewater systems. It is intended to help small utilities, community leaders, and technical support individuals assess and address utility vulnerabilities and update, create, or improve emergency response plans. Resources are divided into three categories: drinking water utility resources, wastewater system resources, and water/wastewater resources. The document briefly describes each resource and provides ordering/purchasing information.

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<th>Item #TRBLGN22</th>
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**Use of Drinking Water State Revolving Fund (DWSRF) to Implement Security Measures at Public Water Systems**—EPA’s Office of Water developed this fact sheet (November 2001) to explain the types of projects and security measures that may be funded through the DWSRF Program.

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Need more security information?

The National Drinking Water Clearinghouse has compiled information about safety precautions for drinking water systems. For more information, visit www.nesc.wvu.edu/ndwc/ndwc_protect.htm.

The National Small Flows Clearinghouse has information about securing wastewater systems. For more information, visit www.nesc.wvu.edu/nsfc/SecuringWasteWaterSystems.html.
The National Environmental Services Center (NESC) is pleased to announce the addition of Lorene Lindsay to its staff. In her position as engineering scientist, Lindsay is using her background in drinking water, wastewater, and environmental training to assist NESC with its technical assistance, publications, outreach, and training programs. She is also assisting the National Environmental Training Center for Small Communities (NETCSC) in developing and delivering the 2004 Environmental Training Institute for Small Communities, which will be held July 27 to 30 in Morgantown, West Virginia.

Lindsay is a longtime supporter of NETCSC’s programs, having served as a NETCSC Associate for the past two years. She has shared her expertise and ideas with NETCSC since 1991, when the organization was first established. She served on NETCSC’s first National Advisory Council that helped to establish it as the country’s central resource for assisting small communities with environmental training. Since that time, Lindsay also has helped NETCSC develop curricula and has delivered nationally targeted training.

Lindsay has extensive experience with both large and small drinking water and wastewater systems and is a certified water and wastewater operator. She is also a certified environmental trainer through the National Environmental Training Association. She has been teaching people about water and wastewater for more than 25 years.

Lindsay was president of Silver Springs Environmental Services, Inc., based in Moberly, Missouri. Established in 1996, the company has provided training and environmental services to local, state, and federal agencies and organizations. Lindsay also served as vice-president of Miller/Lindsay, an engineering firm specializing in small and onsite wastewater treatment system design and operation. She also served as the Missouri Water Environmental Association’s executive administrator and director of the Environmental Resource Center at Crowder College.

“Lorene Lindsay has been a friend to this organization for many years, and we are pleased to have her join the NESC staff,” says Richard Phalunas, Ed.D., NESC managing director. “Lorene is a valuable asset to the organization and the environmental community.”

Dear Editor:

My compliments on the technical assistance (TA) article that appeared in the Winter 2004 issue of E-train. The article did an excellent job describing TA activities and how TA providers can be effective in their works.

I was most disappointed that your article failed to mention the 104(g)1 Onsite Technical Assistance Network that has been operating nationwide for over 25 years. The 104(g) Program was the original TA program sponsored and funded by the U.S. Environmental Protection Agency (EPA). It is the only TA program formally authorized by the Clean Water Act. In fact, the EPA has officially recognized the contributions of the 104(g) Program by presenting “Most Improved Plant Awards” as part of the Clean Water Act Awards Ceremony (formerly the annual “National Wastewater O&M Awards”) each fall.

Here in West Virginia, our Rural Water Association and Rural Community Assistance Program do an outstanding job working directly with small water and wastewater facilities. But our 104(g) Program has brought dozens of plants back into compliance since starting in 1982, during which time our funding has been nearly cut in half. Obviously, 104(g) TA providers need to do a better job tooting their own horns. Congress and E-train haven’t picked up on the success of this program.

Keep us in mind for your next article on TA, and keep up the good work with E-train.

Sincerely,

Richard G. Weigand, C.E.T.
Director
West Virginia Environmental Training Center
Ripley, West Virginia

Editor’s Note: It was certainly not our intention to overlook the long history and excellent work the 104(g) Program does providing technical assistance (TA) to wastewater systems. Rather the article was intended to discuss various types of TA without focusing on any particular assistance network as well as to open a dialogue among assistance providers. To that end, we appreciate you pointing out this oversight and can assure you that we plan to feature the important work of the 104(g) Program in future issues of E-train.
Yes! I want to subscribe to E-train.

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The National Environmental Services Center (NESC) is looking for qualified contractors who are interested in working with our organization to meet the increasing environmental needs of our nation’s small communities. NESC continuously uses external professionals as a means of leveraging resources to meet demands. Thus, NESC is seeking to expand its pool of experts willing to perform contracted, fee-for-service work in support of our missions.

NESC’s programs address a broad range of environmental issues including wastewater, drinking water, solid waste, and environmental training and management. Our programs are national in scope and include such recognized names as the National Small Flows Clearinghouse, the National Drinking Water Clearinghouse, the National Environmental Training Center for Small Communities, and the National Onsite Demonstration Projects. Our target audiences and customers include environmental professionals, local officials, treatment system operators, regulators, and consultants working in and with small communities.

To ensure that you are given consideration for NESC’s future contract needs, you must participate in the Request for Qualification process (even if you have performed services for us in the past). We invite you to do so at this time. The process is easy. Just go to our web site at www.nesc.wvu.edu/nesc/nesc_rfqmain.htm and follow the instructions. By investing only a few minutes, you enter our pool of qualified experts. We will maintain this information confidentially and use it to identify prospective vendors as contractual needs arise. Please act now so that we receive your information as soon as possible.

Cut or copy this coupon and send it to the E-train editor at the address below or fax it to (304) 293-3161.

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