

affect the timely construction of waste treatment facilities in the Commonwealth and completely disrupt the implementation scheduling already promulgated as required by the Federal Water Quality Act of 1965.

In order to properly evaluate the ramifications of this bill, a brief review of the Massachusetts program should be made.

Since the passage of the Federal Water Quality Act of 1965 and the Clean Waters Restoration Act of 1966, the Commonwealth of Massachusetts enacted one of the most comprehensive water pollution control programs in the nation, featuring a \$150 million State Grants Program, a new Division of Water Pollution Control in the Department of Natural Resources, two industrial waste treatment tax incentive laws, one million dollars a year for research and training, and broad authority for enforcing the provisions of the Clean Waters Act. Water Quality Standards have been adopted and approved for the entire State, and the Division has instituted and scheduled an aggressive and comprehensive waste treatment construction program tailored to the financial support authorized by the Clean Waters Restoration Act. Following cut-backs in Federal appropriations in FY 1968, a prefinancing clause was passed by the Massachusetts legislature to allow us to advance the Federal share on eligible projects in order to preserve the integrity of the schedules set forth in our implementation program.

This pending Federal legislation appears to offer several serious deficiencies that would certainly delay and conceivably cripple the efforts of the Commonwealth's water pollution abatement program. Several of these are enumerated as follows:

1. Under H.R. 15907, the Federal reimbursement provisions are discontinued July 1, 1968. To maintain the present Federal grant appropriations and at the same time eliminate the reimbursement provision will reduce the level of construction far below what is required in the State's implementation schedule and serve to lengthen the time period for water quality enhancement of our rivers and streams.

2. The larger communities will be at a disadvantage under the contract provisions because of the method of reimbursement using non-tax exempt bonds contrasted with a smaller community that may receive grants. This constitutes a serious problem as to the equitability between large and small community financing. The appropriation levels are also not specified in the Act and therefore makes it difficult to plan for specified projects on a year-to-year basis.

3. The fact that no state may get more than 10 percent of the total amount of available funds for contracts obviously is disproportionate as the magnitude of State problems vary considerably, and there is no assurance that more serious problems will be rectified on a priority basis. The earlier method of allocations on a population and income basis with State priority schedules certainly appears to be a better approach.

4. The section providing for the local public body to establish a necessary reserve fund is not allowable under the Massachusetts General Laws.

5. The State would certainly agree an operator certification program is a necessary ingredient to an effective water quality control program. At the present time there is a bill for a mandatory Operator Certification Program in the Massachusetts House of Representatives. The effective date for this however is July 1, 1971, which, in our opinion is the earliest we can promote an effective certification program which will include re-training existing operators and instituting a one-year school for inducing new personnel in the operation of waste treatment plant programs.

6. Under the presently anticipated grants for FY 1969 there is some \$225 million authorized for construction grants. H.R. 5907 proposes a research and development program for \$125 million a year on a continuing basis. It certainly would appear that the proportionate amounts for construction grants for waste treatment facilities compared to the amounts being proposed for research is grossly imbalanced. Our State recognizes the needs for continuation of the on-going research and demonstration program but not at a level that is almost 60 percent of the authorized construction levels.

7. The proposed legislation would eliminate the provision in the existing Act that one of the Federal regional water pollution control laboratories shall be located in the Northeastern area of the United States. It is our