

The CW Tea



Monthly Newsletter from CWT Training Academy

2025 - an Overview, and Overture toward Growth

If I had to summarize the last year in stormwater consulting, environmental training, and compliance support, I would describe it as a powerful reminder of why education and trust matter. Many clients came to us facing new permit conditions, unanticipated exceedances and violations, or simply feeling overwhelmed by a growing list of compliance tasks or daunting regulatory updates. But each time, **I saw teams and clients transform once they had the right training, tools, support, and clarity.** Competence builds confidence, and confidence leads to better, more informed, and longer-lasting decision-making - especially when facing big changes.

This year also highlighted the human side of our work. Behind every new face in a training course or informed SWPPP update was a person who took the time to understand their site, take ownership of their responsibilities, and care about the impact of their actions on the environment. **That mindset shift is what makes real change possible.** Whether it's been a maintenance crew finally mastering source control or a construction employee connecting the dots between his daily activity and the health of his environment, these wins matter just as much, if not more, than a clean sample result.

Looking back, I'm proud of how **CWT Academy, CWT Consulting, PUDLE Outreach, and PUDLE Gear helped support growth, education, and deep-seeded change in hundreds of people working all across the country.** This awareness inspired us to perform a self audit (more on page 7), the results of which will guide us as we **expand courses, update curricula, and provide better and bolder training content to keep up with our changing world.**

The past year proved that when we invest in people, training, and professional growth, the environment benefits—and so do the businesses that rely on us. **I'm grateful for the trust you placed in us,** the time spent taking our courses, and the dedication our team showed in meeting your needs.

Have a wonderful Holiday Season, and we can't wait to see you and assist you again in the New Year!

Nathan Hardebeck, Owner of CWT and CWT Training Academy



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UCMR 5 - PFAS DATA RESULTS IN 2026

The Safe Drinking Water Act requires that once every five years the EPA issue a list of unregulated contaminants to be monitored by public water systems across the country. The fifth Unregulated Contaminant Monitoring Rule (UCMR 5) was published in December of 2021, and required sample collection for 29 PFAS compounds as well as lithium, between 2023 and 2025. Last month, EPA released the tenth set of data from UCMR 5 which accounts for approximately 89% of the total expected results before completion of data reporting in 2026.

Policy, Compliance, and Regulatory Corner



Helping you navigate change in 2025

Additionally, January 2026 marks the deadline for any manufacturer of PFAS or PFAS-containing articles in any year since 2011 to report information regarding PFAS uses, production volumes, disposal, exposures, and hazards, under the Toxic Substances Control Act (TSCA) Section 8(a)(7). CWT will be keeping an eye on PFAS regulations in 2026, to ensure you're up to date!

SPOTLIGHT ON: Fats, Oils, and Grease



During the holiday season, fats, oils, and grease (often referred to as FOG) become a major but often overlooked source of pollution. Big meals, rich foods, and frequent cooking generate more FOG than at any other time of year. **When these materials are poured down household drains or washed off cookware, they can solidify in pipes, leading to costly clogs and backups.** In municipal systems, excess FOG contributes to “fatbergs” — large, hardened masses of grease, wipes, and debris that restrict flow and can trigger sewage overflows. These overflows carry bacteria, nutrients, and untreated waste into waterways, creating serious environmental and public health risks.

Proper FOG disposal becomes especially important during the holidays, when wastewater systems are under heavier stress. Simple practices — like scraping plates into the trash, wiping pans with paper towels before washing, and collecting used cooking oil in a sealed container for disposal — go a long way toward preventing pollution. Restaurants, caterers, and commercial kitchens also play a key role by maintaining grease interceptors and managing higher-than-usual kitchen output. **By taking small, proactive steps, households and businesses can keep FOG out of pipes, protect local waterways, and ensure that holiday gatherings don't leave a hidden environmental footprint.**

Want to learn more? Our Illicit Discharge Detection and Elimination (IDDE) training covers everything related to municipal FOG detection and prevention.



BREAKING - UPDATED WOTUS DEFINITION



On November 17, the USEPA and the U.S. Army Corps of Engineers (CoE) unveiled a rule to revise the regulatory definition of the Waters of the United States (WOTUS). The central aim is to implement the guidance from the Sackett v. EPA Supreme Court ruling (2023), which held that **federal jurisdiction under the CWA must be limited to waters with a “continuous surface connection” to traditional navigable waters**.

Key features of the proposal include:

- Defining the term “relatively permanent” waters as those with standing or continuously flowing surface water year-round or at least during the wet season. **Ephemeral waters (that flow only in response to precipitation) would generally not be covered.**
- Requiring a “continuous surface connection” for a wetland or tributary to qualify as a jurisdictional water, aligning with Sackett’s requirement that the boundary between water and wetland be indistinguishable.
- Excluding certain features--for example, **explicitly excluding groundwater** from federal jurisdiction under WOTUS.
- Streamlining regulatory certainty: the agencies state the rule seeks to promote predictability, reduce regulatory burden, and clarify the line between federal vs. state/tribal authority over waters.



For practitioners, landowners, developers, stormwater professionals, and regulators alike, the proposed WOTUS changes carry significant implications. Per the Sackett and other court decisions, regulation must now account for limits on federal authority, while we still try to protect the integrity of the nation’s waters (a core goal of the CWA).

In short: the proposed 2025 WOTUS rule signals a clear shift toward narrower federal jurisdiction under the Clean Water Act—focused on more permanent, connected waters while pulling back from ephemeral streams, isolated wetlands, and groundwater. **For stormwater professionals, consultants, developers, and regulators, this means the map of when federal permits apply may change—and with that, the strategies for compliance, training, sampling, and mitigation must adapt.** Whether the trade-offs of greater clarity but narrower coverage will lead to better outcomes for water quality and ecosystems remains to be seen—and will depend significantly on how states and tribes respond and how the rule is implemented (and litigated) in practice.

See the following page for our analysis on how this responsibility shift will affect practitioners in states our readers commonly work in.

State by State Analysis of the WOTUS Proposal

Washington

Washington's permitting landscape (and some agencies and DOT guidance) already includes pathways for delineation, mitigation, and mitigation banking, and Ecology has been discussing state-level programs to authorize impacts to "waters of the state" where federal CWA coverage does not apply. For stormwater practitioners in Washington this likely means: continue working with Corps jurisdictional determinations when federal triggers exist, but also plan for more interactions with Ecology and local permitting authorities, ensure SWPPPs and wetland avoidance/minimization documentation are robust, and expect to see an increased role for state mitigation

Oregon

Oregon's environmental regulators have publicly pushed back on broader federal rollbacks in 2025 and have been active in signaling opposition to actions that would weaken environmental protections. Practically, Oregon is well positioned to maintain or even strengthen state protections for wetlands and non-federal waters (through DEQ, DSL, and local programs). For consultants and trainers: assume state oversight will remain consequential – update trainings and compliance checklists to include Oregon's state standards, and maintain documentation that demonstrates pollutant control even when federal jurisdiction is narrowed.

California

California legislators are already responding: AB 2875 would provide funding and staffing to the State Water Board in anticipation of a higher permitting load for waters that lose federal oversight. There's also discussion of SB 601, the "Right to Clean Water Act," which proposes to create a new state water-category called "nexus waters" to recapture protections lost due to narrowing WOTUS, and to grant citizen enforcement. For stormwater practitioners in California, the takeaway is that the policy trend suggests a long-term shift: California may increasingly rely on its own water quality regulators rather than the U.S. Army Corps for wetlands oversight.

Idaho

Idaho has historically pushed for clearer, narrower federal definitions and has at times joined multi-state challenges to broader WOTUS rules; the state emphasizes cooperative federalism and predictability but also raises concerns about implementation burdens. If the federal rule narrows protections, Idaho may lean on state authority to manage some waters – but the state's approach can also favor reduced federal oversight for agricultural and private-land interests.

Minnesota

Several Minnesota agencies found in a recent assessment that many types of wetlands—seasonal potholes, floodplains, peatlands—could lose federal protection because they lack the "continuous surface connection" required under the proposed rule. However, Minnesota already regulates many of those same features under its Wetland Conservation Act (WCA) and Public Waters Permit Program, so even if federal 404 (dredge/fill) jurisdiction is narrowed, state-level permitting may pick up the slack. Very small or headwater streams that are not classified as "public waters" may therefore escape both state and (potentially) federal oversight, though.

Montana

In Montana, the narrowing of the WOTUS definition raises specific concern because many smaller streams, seasonal waters, and wetlands could fall outside federal jurisdiction. Montana DEQ has already issued a public notice around Clean Water Act Section 401 certification for the 2026 Nationwide Permits, which means that regulatory scrutiny remains very much alive even if some waters become non-jurisdictional under WOTUS. For stormwater professionals in Montana, that means more careful up-front assessment of whether a given stream or wetland really has the "continuous surface connection" that would make it federally regulated.



In 2026, the **USEPA is planning to roll out two major general permits** that will shape industrial and construction stormwater compliance: the Multi-Sector General Permit (MSGP) for industrial facilities, and the Construction General Permit (CGP) for construction sites. On the industrial side, this updated permit would cover approximately 30 industrial sectors, with new requirements around benchmark monitoring, inspections, and control measures. Notably, the draft permit includes more rigorous data collection and reporting — including for emerging contaminants like PFAS — and tighter conditions to prevent visible pollution (e.g., sheen, foam, floating solids). On the construction side, many states are updating their CGPs in turn.

Below are the state-specific Construction and Industrial Stormwater General Permits up for renewal in 2026, that you may be interested in!

Construction

- Florida - January
- Wisconsin - March
- Tennessee - May
- Nevada - June
- New Mexico - June
- Vermont - July
- Connecticut - September
- Hawaii - October
- Oregon - November
- Kansas - December
- North Carolina - December

Industrial

- Delaware - February
- Florida - March
- Alabama - March
- Arizona - May
- Arkansas - June

All of these permit reissuance cycles provide public comment periods. **Make your voice heard!** Stay tuned here in 2026 for notifications from CWT about upcoming permit changes and renewals.

Interested in a crash course on EPA permitting, the Clean Water Act, MSGPs, ISGPs, CSGPs, and more? Check out our [Stormwater Regulations Overview](#) training that provides an overview of the stormwater industry and regulations that govern it, no matter where you live or work in the country.

Keep an eye out for state-specific permit trainings coming soon in 2026!

CWT Academy Growth At-A-Glance

Total Enrollments

11,088

Unique Learners

2,534

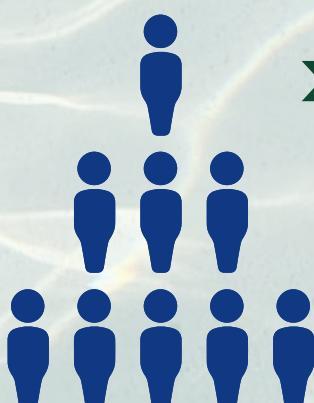
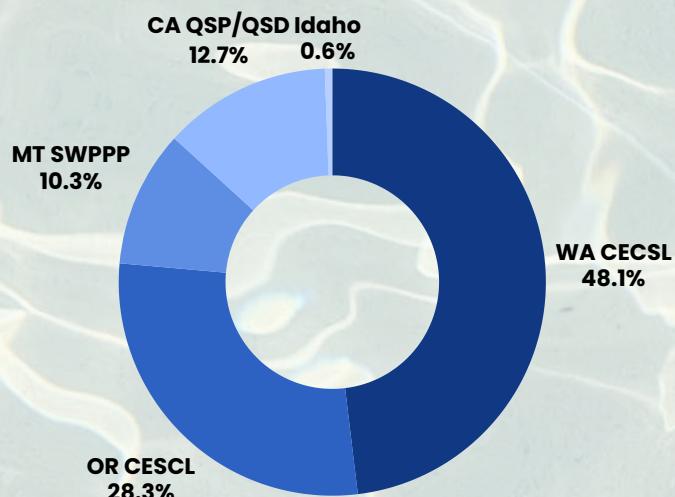
Certifications Issued

996

Learners Joined us from:

- # of States - 2025 29 ▲ 26%
- # of States - 2024 23 ▲ 21%
- # of States - 2023 19

Certifications in 2025 by Type:



>40!

Unique types of organizations

- Cities, counties, and ports
- State & federal transportation orgs
- Utility providers
- Airports
- Tribal groups
- Landscapers
- Mining & geology groups
- Sand & gravel companies
- Lumber and forestry companies
- Hydroseeders
- Excavators
- Fence builders
- Environmental consultants
- Engineering firms
- Architects
- Habitat for Humanity
- Churches
- Stone masons
- Demolition companies
- Crane operators
- Food manufacturers/packagers
- Glass manufacturers
- Environmental restoration groups
- Water & conservation districts
- Compost facilities
- Iron workers
- Bridge builders
- Paving and asphalt companies
- Property managers and developers
- College students & young professionals
- Hospitality groups
- Branches of the US Military
- Solid waste/recycling managers
- Plumbing companies
- Street sweepers
- Private citizens





AUDIT Announcement!

ATTENTION LEARNERS!

**BIG Things Are Coming in 2026!
Your CWT Academy is Leveling Up**

In 2025 we asked for your feedback; as a result, we are incorporating new features and technology to enhance your learning and training experiences. For the past several months, our team has been reviewing every lesson, every test question, every downloadable, every video. We're modernizing content, aligning everything with the most up-to-date regulatory changes, and polishing the entire learning experience so your training feels smoother, clearer, and more worthwhile than ever before.

A brand-new lineup of courses, updated content, regulatory-aligned materials, and new site and course features are launching January 2026!

Stay tuned with our Communities, social media, and this newsletter for all the updates!

Starting December 23, CWT will temporarily pause registrations for certifications in order to update and reload all course content. We will resume accepting registrations on January 1, 2026.

Plan ahead and register for your certification before December 22, 2025 or wait until the turn of the year. Other non-certification courses should remain available. Reach out with any questions or concerns!

GET READY FOR THE NEW 2026 WASHINGTON CONSTRUCTION STORMWATER GENERAL PERMIT (CSGP) EFFECTIVE JANUARY 1ST

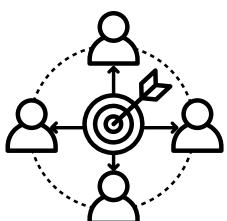


THE NEW PERMIT WILL REPLACE THE 2021 CSGP



Key items include:

- Sampling is required on **all** sites regardless of acreage
- **All** site inspections must be completed by a CESCL
- pH paper strips no longer an allowed testing method
- Dissolved oxygen added to list of 303(d) limit triggers
- Certain compliance requirements removed based on 2025 Supreme Court decision (San Francisco vs. EPA)



Need more information? CWT Training Academy can help:

- Our Certified Erosion and Sediment Control Lead (CESCL) training covers all aspects of CSGP compliance - including 2026 permit changes and considerations - and certifies you or your staff to complete inspections.
- Stay tuned for upcoming CWT Trainings!

“CONSTRUCTION SUPPORT” ACTIVITY

This new CSGP provides clarification on activities that require permit coverage, expanding from a general definition of construction activity to encompass construction support activities as well. These include:

- material storage areas, dump areas, and staging yards
- haul roads and construction roads,
- borrow pits,
- side-cast areas,
- on-site portable rock crusher,
- parking areas,
- off-site construction support activities, and
- **all other soil disturbing activities**

This change will result in many more sites requiring CSGP coverage - **be sure to verify if your site needs a permit!**

MONITORING AND SAMPLING

- A certified CESCL must now conduct all site inspections, which are now required **weekly on every site regardless of disturbed acreage**.
- Turbidity and pH sampling are also required **weekly on every site regardless of disturbed acreage**.
- Turbidity sampling is required **daily on dewatering sites** whenever discharge occurs.
- DMRs are still required to be submitted monthly for all sites.
- **Reach out to chat with us on any questions you have!**



SUPREME COURT RULING - SAN FRANCISCO VS EPA

- In March of 2025, the Supreme Court ruled that Permittees can only be held accountable for the quality of the water they directly discharge, NOT the quality of the receiving water.
- Language about discharges contributing to receiving water violations has been removed from 2026 CGSP
- Additional language and requirements protecting direct site discharges has been added throughout.





UPCOMING EVENTS

Trainings, conferences, fun, and other happenings to keep you in the know in 2025

We are booking our public, private, in-person, and virtual courses and trainings into **January 2026** now!
Reach out to info@cwtacademy.com
or visit cwtacademy.com
to check out all of our event offerings

Come See the Academy! [Register here!](#)

- CESCL Full Certification - January 28/29 - Salem, OR
- BMP Workshop - January 30, Salem, Oregon
- North American Water Loss Conference
December 2-4, Louisville, Kentucky
- NEBC Business & Environment Conference
December 9-10, Portland, Oregon
- World Conference on Soil, Water, Energy and Air
January 1-2, Minneapolis, Minnesota
- Evergreen Rural Water of Washington Conference
February 10-12, Ridgefield, Washington
- Colorado Annual Water Congress
January 28-30, Denver, Colorado

Other Events and Happenings



Enjoy our
“12 Days of Sales”
sale, December 1-12!
Check out
PUDLEGear.com for
daily specials!



SPECTRO'S SPOTLIGHT

OWLS & TOXIC CHAINS

Starting the first Monday of every month, **we'll be shining Spectro's Spotlight** — a weeklong educational series that runs Monday through Friday, exploring how stormwater affects different animal species and their habitats. Each month, Spectro will highlight a new featured creature to help us understand how what happens on land impacts life in the water, and vice versa!

This month, **Spectro's Spotlight takes flight into the night sky** to explore how stormwater pollution connects to food webs — and how toxins move up the chain from prey to predator. Our featured creature, the owl, shows how chemicals and pollutants that wash off streets and lawns can build up in small animals and eventually reach top predators. Each day, Spectro will reveal a new lesson about how stormwater affects wildlife far beyond the water's edge — complete with free educational coloring and activity pages for classrooms, families, and nature lovers alike.



Every Spotlight will include a free downloadable coloring or activity page, perfect for classrooms, youth groups, or families who want to bring stormwater awareness to life through creativity and science. Join us each month for Spectro's Spotlight, **and discover how clean stormwater protects every creature!**

Follow CWT Training Academy for this and other fun, useful, and educational content on [Instagram](#), [Facebook](#), and [LinkedIn](#)

