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Metropolitan  
Sewerage Agencies

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Ken Kirk

February 12, 2001

Mr. Geoff Grubbs  
Director, Office of Science and Technology  
Office of Water  
U.S. Environmental Protection Agency  
Ariel Rios Building (4301)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: REQUEST FOR EXTENSION OF COMMENT PERIOD - MP&M PROPOSAL

Dear Geoff:

The Association of Metropolitan Sewerage Agencies (AMSA) respectfully requests that EPA extend the comment period deadline for its January 3, 2001 proposed Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Metal Products and Machinery Point Source Category by an additional 90 days. AMSA represents over 260 POTWs nationwide and through local pretreatment programs, regulate a majority of the entities potentially impacted by the proposed rule. POTWs will also bear a significant burden to implement the rule through the issuance of new or revised permits, and implementation of additional oversight activities associated with the addition of newly regulated entities.

This proposal, which by EPA's estimates may impact nearly 10,000 businesses and over 1,000 POTWs nationwide, is one of the most far reaching and complex effluent guidelines undertaken by the Agency. While we have been able to perform a preliminary review of the rule, the record and development documents since the rule's publication, it is apparent that a significant amount of research and data collection will be needed to adequately provide comment on the proposal.

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From our preliminary review, AMSA has many questions regarding the Agency's estimates for POTW administrative burden, POTW and water quality benefits, baseline industrial pollutant loadings, and the achievability of the proposed standards. In several areas of the development documents, it appears that EPA has grossly overestimated or underestimated the respective benefits and costs to POTWs in implementing the rule. In order to statistically assess the accuracy of EPA's cost/benefit analysis and the rule's impact on POTWs and industries, AMSA plans to collect additional data from the 150 POTWs EPA originally surveyed as part of the rule's development. AMSA's Board of Directors approved funding to perform this effort during their quarterly meeting in San Diego, CA on February 2.

We believe that this additional data collection effort and subsequent analysis will take longer than the 120 day window currently allotted to comment on the rule. For comparison, AMSA's current biosolids survey, which is being conducted in response to the Agency's proposed revisions to Part 503 is expected to be complete in May 2001, almost eight months after it was initiated. Similar to the biosolids survey, AMSA hopes this additional data collection effort will provide useful information for the Agency in developing a final rule.

AMSA would very much appreciate your attention to this request and your prompt action to extend the comment deadline. If you have any questions, please contact me at 202/833-4653 or Mark Hoeke at 202/833-9106.

Sincerely,

A handwritten signature in black ink, appearing to be the name 'Ken Kirk', written in a cursive style.

Ken Kirk  
Executive Director

cc: Sheila Frace, U.S. EPA  
Marvin Rubin, U.S. EPA  
Shari Barash, U.S. EPA  
Michael Ebner, U.S. EPA