



Association of  
Metropolitan  
Sewerage Agencies

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April 27, 2001

Water Docket  
Docket No. W-01-02  
MC 4101, U.S. EPA  
1200 Pennsylvania Ave., NW.  
Washington, DC 20460

The Association of Metropolitan Sewerage Agencies (AMSA) appreciates the opportunity to provide comments on the National Water Quality Monitoring Council's proposed *Data Elements for Reporting Water Quality Results of Chemical and Microbiological Analytes*. AMSA represents the interests of the nation's publicly-owned wastewater treatment works (POTWs). AMSA's member agencies collectively serve the majority of the sewered population in the United States and treat and reclaim more than 18 billion gallons of wastewater every day. AMSA has reviewed the proposed data elements and has the following comments:

As an overall matter, we support the development of voluntary standards for the reporting of environmental data. We find that the proposed data elements provide the critical information necessary to effectively evaluate and use water quality data for various purposes.

We do, however, find the two data elements on detection and regulatory reporting levels somewhat misleading and question the need to have two separate reporting levels. We understand the importance of highlighting the significant differences between analytical detection and quantitation levels and the differences in regulatory reporting levels from one program to another. It is essential that stakeholders recognize these differences when evaluating water quality data to ensure accurate data interpretation. However, we suggest combining the two reporting categories (detection and regulatory) into one "reporting level" element and expanding the definition to encompass the definitions of regulatory reporting level and detection level. This change would reflect the differences between the levels by allowing the reporting agency to include the level and indicate the basis for the level (i.e., required by permit, an intra-laboratory detection level, an inter-laboratory detection level, an inter-laboratory quantitation level, etc.). This type of reporting would simplify data

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interpretation by stakeholders by eliminating the need to resolve two different levels reported for the same parameter and sample.

Again, AMSA appreciates the opportunity to comment on the proposed *Data Elements for Reporting Water Quality Results of Chemical and Microbiological Analytes* and the opportunity to participate with the Methods Board and the National Water Quality Monitoring Council. If you have any questions please contact me on 757/460-4243 or Christopher Hornback at AMSA on 202/833-9106.

Sincerely,

A handwritten signature in black ink that reads "Norman LeBlanc". The signature is written in a cursive style with a large initial "N" and a long, sweeping underline.

Norman LeBlanc  
Chair, AMSA Water Quality Committee  
Chief, Technical Services  
Hampton Roads Sanitation District