



Attachment D

## Technical Action Fund Budget Projections 2002-2003

<p align="center"><b>Biosolids</b></p> <p align="center"><i>Estimated Expenses for 2002 Biosolids Projects:\$100,000</i></p> <p align="center"><i>Preliminary Estimated Expenses for 2003 Biosolids Projects:\$25,000</i></p>		
Project/Description	Timing	Est. \$
<p><b><i>Dioxin Study</i></b> Continued follow up on AMSA's study of dioxin levels in municipal biosolids. Potential new set of comments on re-proposal or litigation.</p>	2002	\$25,000
<p><b><i>Dioxin Soil Sampling</i></b> Support AMSA's efforts to characterize background concentrations of dioxin in soil in the United States.</p>	2002	\$50,000
<p><b><i>Dioxin - Round I Phase II Comments</i></b> Support AMSA's preparation of comments on proposed changes to 40 CFR Part 503 regulations.</p>	2002	\$25,000
<p><b><i>Radioactivity - Dose Model</i></b> Follow-up work on EPA's radioactivity dose model and potential comment preparation for rulemaking activity.</p>	2003	\$25,000
<p align="center"><b>Pretreatment</b></p> <p align="center"><i>Estimated Expenses for 2002 Pretreatment Projects:\$70,000</i></p> <p align="center"><i>Preliminary Estimated Expenses for 2003 Pretreatment Projects:\$15,000</i></p>		
Project/Description	Timing	Est. \$
<p><b><i>Miscellaneous Effluent Guidelines</i></b> To support comment efforts on EPA's effluent guidelines for POTWs and industries.</p>	2002 2003	\$15,000 \$15,000
<p><b><i>Update of EPA's "50 POTW Survey"</i></b> This EPA survey conducted in the 1970's is the basis for many of EPA's numbers for POTWs regarding Effluent Guidelines. (AMSA may pursue funding from EPA to conduct this project. AMSA support more likely to be in-kind)</p>	2002	\$25,000

<b><i>Pretreatment (Continued)</i></b>		
<b>Project/Description</b>	<b>Timing</b>	<b>Est. \$</b>
<b><i>“Working with Industrial Users” Guidance</i></b> Building on AMSA’s success with the Textile Rental Services Association’s Guidance “Working with Your POTW”, AMSA would like to develop similar guidance documents for POTWs to use with their Industrial Users.	2002	\$10,000
<b><i>Metal Products and Machinery</i></b> To aid AMSA’s comment efforts upon EPA’s issuance of a Notice of Data Availability (NODA) for the proposed Effluent Limitation Guidelines for Metal Products and Machinery expected in February 2002.	2002	\$15,000
<b><i>Pretreatment Streamlining</i></b> To aid AMSA’s comment efforts should EPA request AMSA’s assistance in quantifying the potential effects of a change in the pH standard on the nation’s wastewater infrastructure as laid out in the Pretreatment Streamlining Rule.	2002	\$ 5,000
<b><i>Management &amp; Operations</i></b> <i>Estimated Expenses for 2002 Management &amp; Operations Projects:\$75,000</i> <i>Preliminary Estimated Expenses for 2003 Management &amp; Operations Projects:\$0</i>		
<b>Project/Description</b>	<b>Timing</b>	<b>Est. \$</b>
<b><i>2002 AMSA Financial Survey</i></b> Published every 3 years, the Financial Survey has consistently proven itself to be a valuable resource for AMSA member agencies as they evaluate financing options and consider rate adjustments.	2002	\$50,000
<b><i>Leadership Center</i></b> In association with the Kenan Flagler Business School at the University of North Carolina, Chapel Hill, AMSA, AMWA, WEF and AWWA have developed a Leadership Center for leaders and future leaders of the water and wastewater community. These funds will ensure the continuation of this important program for the coming years.	2002	\$25,000
<b><i>Wet Weather</i></b> <i>Estimated Expenses for 2002 Wet Weather Projects:\$50,000</i> <i>(Additional 2002 Wet Weather Projects can be found in the Legislative Policy Section)</i> <i>Preliminary Estimated Expenses for 2003 Wet Weather Projects:\$70,000</i>		
<b>Project/Description</b>	<b>Timing</b>	<b>Est. \$</b>
<b><i>“Performance Measures for the National SSO Control Program” Document</i></b> After EPA finalizes its SSO policy AMSA would produce an SSO Performance Measures document similar to that of the CSO document completed in 1996, to evaluate and showcase EPA’s new measures.	2003 (or 2004)	\$40,000
<b><i>Zero Discharge Policy Technical Study</i></b> Retain technical consultant to study achievability of a zero discharge standard or similar project to support AMSA’s SSO advocacy.	2002	\$40,000

<i>Wet Weather (Continued)</i>		
Project/Description	Timing	Est. \$
<p><b><i>Collection System Capacity Study</i></b>            To survey AMSA's members and affiliates and develop a picture of appropriate and reasonable sanitary sewer design. This information would be used to support AMSA's alternative approach to capacity determinations for collection systems. (Possible AMSA/EPA Cooperative Agreement)</p>	2002 2003	\$10,000 \$30,000
<p><b><i>Legal Affairs</i></b>  <i>Estimated Expenses for 2002 Legal Affairs Projects: \$95,000</i>  <i>Preliminary Estimated Expenses for 2003 Legal Affairs Projects: \$90,000</i></p>		
Project/Description	Timing	Est. \$
<p><b><i>General Legal Support</i></b>            These funds will be used to consult when needed with outside counsel on various AMSA matters, including strategic advice, review of AMSA briefs, and regulatory counsel.</p>	2002 2003	\$35,000 \$35,000
<p><b><i>Specific TMDL Litigation</i></b>            AMSA expects to become involved in litigation in various parts of the country where specific TMDLs would set favorable or unfavorable precedent for AMSA members. The funds would finance outside counsel support of AMSA's activities or AMSA participation in litigation coalitions.</p>	2002 2003	\$10,000 \$10,000
<p><b><i>TMDL Rule Briefing</i></b>            When EPA finalizes new TMDL regulations, AMSA expects that litigation will still occur over a narrow set of issues (e.g., requirements for nonpoint sources). The funds would finance outside counsel support of an AMSA brief.</p>	2003 (or 2004)	\$20,000
<p><b><i>Stormwater Briefs</i></b>            AMSA expects that the D.C. Permit litigation and other cases raising the issue of whether numeric limits are appropriate in urban stormwater permits will mature in 2002-2003. The funds would finance outside counsel support of AMSA's activities or AMSA participation in litigation coalitions.</p>	2002 2003	\$10,000 \$10,000
<p><b><i>SSO Enforcement Brief</i></b>            With SSOs a top priority issue, AMSA expects to become involved in member agency litigation (likely as amicus curiae) concerning SSO enforcement. The funds would finance outside counsel support of AMSA's activities.</p>	2002	\$10,000
<p><b><i>Pronsolino v. Marcus Supreme Court Amicus Brief</i></b>            AMSA anticipates that the party ruled against by the Ninth Circuit Court of Appeals could raise the Pronsolino case to the U.S. Supreme Court. Depending on the Ninth Circuit's decision, AMSA would consider an amicus curiae either in favor (or not in favor) of the High Court granting certiorari. The funds would finance outside counsel support of AMSA's activities.</p>	2002	\$15,000

**Legal Affairs (Continued)**

Project/Description	Timing	Est. \$
<b><i>Dioxin Litigation</i></b> Should EPA finalize a dioxin limit in sewage sludge that AMSA views as arbitrary or capricious, AMSA would consider litigation over the final rule. The funds would finance outside counsel support of AMSA's activities.	2002 2003	\$10,000 \$10,000
<b><i>TMDL Document Update</i></b> Should EPA finalize new TMDL rules, AMSA would need to update the "Evaluating TMDLs . . . Protecting the Rights of POTWs" document based on the new regulations; AMSA also may consider a 2002 supplement to the May 2000 update; funding would be used for outside counsel review of the proposed update or supplement.	2003	\$ 5,000
<b><i>Wet Weather Legal Guide</i></b> AMSA is preparing a legal guide similar to AMSA's TMDL guide for POTWs on wet weather issues; funding would be used for outside counsel review of the proposed update or supplement.	2002	\$ 5,000

**Legislative Policy**

*Estimated Expenses for 2002 Legislative Affairs Projects:\$155,000*

*Preliminary Estimated Expenses for 2003 Legislative Affairs Projects:\$65,000*

Project/Description	Timing	Est. \$
<b><i>Wet Weather/Nonpoint Legislative Activities</i></b> To aid AMSA's efforts to build support in Congress for AMSA led legislation related to wet weather programs and nonpoint source control under the Clean Water Act.	2002	\$80,000
<b><i>National Biosolids Partnership</i></b> Continued support for the AMSA and WEF's efforts to secure funding for the NBP.	2002 2003	\$15,000 \$15,000
<b><i>Water Infrastructure Network</i></b> Continued support of WIN in it's efforts to build support for water infrastructure funding legislation and initiatives.	2002 2003	\$50,000 \$50,000
<b><i>Update of "Clean Water . . . We've got the point. Now Let's Get to the Nonpoint" Publication</i></b> With the new Administration's attention turning to changing the TMDL rules and potentially relaxing nonpoint requirements, AMSA plans to update our nonpoint publication. Originally written in 1999, this publication best summarizes AMSA's position and suggestions to EPA on solutions to nonpoint pollution.	2002	\$10,000

**Water Quality**

*Estimated Expenses for 2002 Water Quality Projects: \$50,000*

*Preliminary Estimated Expenses for 2003 Water Quality Projects: \$15,000*

Project/Description	Timing	Est. \$
<i>Wetlands Guidance Document Comments</i> Secure support for AMSA's comment preparation efforts for EPA Wetlands Guidance Document.	2002	\$15,000
<i>Nutrient Criteria Comments</i> Secure support for AMSA's comment preparation efforts for additional eco-regional nutrient criteria	2003	\$15,000
<i>Mercury</i> Comments on EPA Guidance for Development of Human Health Criteria (additional project list attached, but not considered candidates for TAF Funding).	2002	\$30,000
<i>WET Study</i> Continued contractual support for AMSA's follow up activities in relation to the review of EPA's <i>Preliminary Report: Interlaboratory Variability Study of EPA Short-term Chronic and Acute Whole Effluent Toxicity Test Methods</i> .	2002	\$5,000
<b>ESTIMATED 2002 GRAND TOTAL TO DATE</b>		
		<b>\$595,000</b>
<b>PRELIMINARY 2003 ESTIMATED TOTAL TO DATE</b>		
		<b>\$280,000</b>

*(Current to August 2001)*

## *List of Other Potential Mercury Research Projects*

There are a number of other projects that are of interest to the Workgroup that would provide important information for developing a national mercury compliance strategy. Based on the size and scope of the projects, they are not considered to be candidates for TAF funding, but could be funded through AMSA/EPA cooperative grants or perhaps through WERF. They include the following:

- # *Quantification of Mercury Loadings From Human Wastes* - In our report “Evaluation of Domestic Sources of Mercury,” we found that mercury from human wastes (feces and urine) from amalgam loaded individuals was the most significant source (> 80%) of mercury in domestic wastewater. The basis for that finding was a study done by Skare (*Water, Air, and Soil Pollution 80: 59-67, 1995*), which showed that dental amalgam-loaded individuals excrete mercury at average rates of 64 ug/day in feces and 4.5 ug/day in urine. The individuals studied were selected to represent a broad range in amalgam loadings, and none normally ate fish from lakes or smoked. Unfortunately, this particular study was based on a very small study size. In addition, we have very limited information on the number of amalgam surfaces per person in the U.S. based on sex, age, etc. EPA has been very skeptical about this information, and its role in the feasibility of source control in reducing mercury discharges to POTWs. We believe that it will be important to conduct a follow-up to the Skare study that is based on a larger sample size and with a nationwide estimate of the number of amalgam surfaces per individual based on demographics.
  
- # *Quantification of Mercury Loadings From Mercury Deposits* - There is considerable variability in the concentration of mercury present in the influents to POTWs, which may be the result of mercury deposits in collection systems. Because many collection systems are old and because of the nature of mercury to seek out low lying areas, this could prevent POTWs from meeting limits even if the major sources to the collection system were eliminated. This issue has been raised by EPA in our discussions over mercury sources and control strategies. The project could also be expanded to look at the solubility of dental amalgam in sewers. Some AMSA members have begun to develop studies that will address these issues. If done nationally, this project would have more credibility and application, and AMSA could expect considerable member support/involvement.
  
- # *Potential Follow-up Studies to the AMSA/EPA Mercury Pollution Prevention Project* - In October, our joint project with EPA regarding the feasibility and effectiveness of pollution prevention in controlling mercury will be completed. One of the likely outcomes of the project will be recommendations on follow-up studies to fill in information gaps related to refining and verifying mass balances for mercury coming into POTWs.

