



Association of
Metropolitan
Sewerage Agencies

President
William B. Schatz
General Counsel
Northeast Ohio Regional
Sewer District
Cleveland, OH

July 12, 2004

Vice President
Donnie R. Wheeler
General Manager
Hampton Roads Sanitation
District
Virginia Beach, VA

Geoffrey H. Grubbs
Director, Office of Science and Technology
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW (4301)
Washington, DC 20460

Treasurer
Dick Champion, Jr.
Director
Water Pollution Control
Department
Independence, MO

Dear Geoff:

Secretary
Christopher M. Westhoff
Assistant City Attorney
Public Works General Counsel
City of Los Angeles
Los Angeles, CA

As you know, your office recently notified the public of its intent to re-evaluate the current aquatic life criteria for ammonia to determine if a revision is necessary (69 *Fed. Reg.* 41262; July 8, 2004). We understand from the notice that recent studies on freshwater mussels suggest that some mussel species may be more sensitive to ammonia exposure than the aquatic organisms your office considered in deriving the existing criteria. While AMSA has just begun to review these new studies, we are concerned that the 30-day comment period will not allow us to sufficiently review the studies and seek out any additional data from our membership. Therefore, AMSA is requesting that EPA formally extend the comment period by 60 days, to provide the regulated community with ample time to provide the agency with additional data.

All of AMSA's nearly 300 public wastewater treatment agency members will likely be impacted by a revision of the ammonia criteria. AMSA plans to solicit data these agencies may have on ammonia toxicity that may be of use to the Agency today. AMSA will need time to coordinate this data collection effort and may need to retain the services of a consultant to aid with its review of the relevant studies.

Thank you for considering our request for a 60-day comment period extension. Please contact Chris Hornback of my staff at 202/833-9106 if you should have any questions.

Sincerely,

Ken Kirk
Executive Director