

*President*  
William L. Pugh  
Public Works Director  
City of Tacoma  
Public Works Department  
Tacoma, WA

*Vice President*  
Gurnie C. Gunter  
Director  
Kansas City Water  
Services Department  
Kansas City, MO

*Treasurer*  
Paul Pinault  
Executive Director  
Narragansett Bay Commission  
Providence, RI

*Secretary*  
Thomas R. "Buddy" Morgan  
General Manager  
Water Works & Sanitary Sewer Board  
Montgomery, AL

*Executive Director*  
Ken Kirk

June 13, 2000

Ms. Sheila Frace  
Division Director  
Engineering and Analysis Division  
U.S. Environmental Protection Agency  
Ariel Rios (4303)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Dear Sheila:

The Association of Metropolitan Sewerage Agencies (AMSA) is pleased to support National Tank Truck Carriers Incorporated comments on the proposed Effluent Limitation Guidelines, Pretreatment Standards, and New Source Performance Standards for the Transportation Equipment Cleaning Point Source Category. AMSA represents the interests of 246 of the nation's publicly-owned wastewater treatment agencies. Together, AMSA member agencies serve the majority of the sewered population and treat and reclaim more than 18 billion gallons of wastewater every day. AMSA's member agencies are the principal implementors of the pretreatment program.

AMSA is concerned about the possibility of over burdening facilities that are already appropriately regulated under existing pretreatment programs with water quality based local limits. Many of the facilities with transportation equipment cleaning (TEC) are parts of larger operations adequately overseen by the local publicly owned treatment works (POTW).

We understand that National Tank Truck Carriers Incorporated which represents the industries impacted by this rule, is promoting a code of best management practices (BMPs) in lieu of the proposed guidelines. Such BMPs would ensure that TEC dischargers meet applicable goals of the program. AMSA favors such an approach

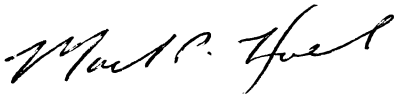
June 13, 2000

Page 2

as many of the TEC facilities that are potentially impacted by this rule are generally covered under local limits. If for some reason the facility is not covered by the POTW, the National Tank Truck Carriers Incorporated have proposed a certification statement which would implement a code of BMPs for the facility. To date, wastewater treatment facilities which accept transportation cleaning effluent have had little indication of problems with these discharges. If problems do arise, the existing pretreatment authorities are adequate to control isolated discharges.

Just like the Industrial Laundry Guidelines, AMSA would support a voluntary BMP program and we would be willing to work with National Tank Truck Carriers Incorporated to assist with developing the BMPs. If you would like to discuss AMSA's comments, please contact either myself at 202/833-9106 or Guy Aydlett, Hampton Roads Sanitation District, 757/460-4220.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Hoeke". The signature is written in a cursive style with a large, sweeping initial "M".

Mark Hoeke  
Director, Government Affairs