



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

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

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

Secretary
Dick Champion
Director
Water Pollution Control
Department
Independence, MO

Executive Director
Ken Kirk

Association of
Metropolitan
Sewerage Agencies

October 14, 2003

Water Docket
U.S. Environmental Protection Agency
Mailcode 4101T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Attention Docket ID No. OW-2002-0014

Re: *Effluent Limitations Guidelines and New Source Performance Standards for the Meat and Poultry Products Point Source Category; Notice of Data Availability, 68 Fed. Reg. 48471 (August 13, 2003)*

Dear Sir or Madam:

The Association of Metropolitan Sewerage Agencies (AMSA) is pleased to provide comments in support of the U.S. Environmental Protection Agency's (EPA's) *Effluent Limitations Guidelines and New Source Performance Standards for the Meat and Poultry Products Point Source Category; Notice of Data Availability*. Founded in 1970, AMSA represents the interests of nearly 300 of the nation's publicly owned treatment works (POTWs). AMSA members serve the majority of the sewered population in the United States and collectively treat and reclaim over 18 billion gallons of wastewater each day. As key stakeholders in the effluent limitations guidelines (ELG) program, AMSA members continue to oversee implementation of EPA's categorical pretreatment standards and are actively engaged in the national dialogue on the development of those standards. At the same time, AMSA members along with thousands of other POTWs continue to develop and implement local programs tailored to the water quality needs of their community.

Over the last several years AMSA has met with EPA on a number of occasions to discuss specific ELGs and the program as a whole. When AMSA learned that the Agency was planning to propose categorical pretreatment standards for indirect dischargers in the meat and poultry products (MPP) point source category, we met

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with the Agency and explained how such standards would be duplicative of the treatment already provided by POTWs and how the standards would impact POTW operations.

The Agency's supporting materials for the proposal indicated that these wastes are not causing widespread problems for the nation's POTWs. In response to a request for comments, AMSA provided the Agency with data demonstrating that there was no need to establish categorical pretreatment standards for the MPP point source category. As the Notice of Data Availability (NODA) points out, EPA did receive data from EPA Region 5 and two states describing random incidents of interference and that EPA, in the NODA, correctly considered the data received as insufficient to warrant pretreatment standards for the MPP industry – an outcome that AMSA applauds.

AMSA fully supports EPA's decision not to promulgate categorical pretreatment standards for the MPP point source category. MPP facilities discharge pollutants that are compatible with the POTW treatment processes that receive them. To require MPP facilities to install treatment to control conventional pollutants would not only duplicate treatment already provided by POTWs but would also eliminate a vital source of revenue for many of the nation's municipalities. As even the Agency's supporting materials demonstrate, interference and pass-through episodes caused by MPP facilities are rare occurrences that are best addressed at the local level.

Thank you again for the opportunity to comment on this critical effort. If you have any questions about our comments please do not hesitate to call me at 202/833-9106.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hornback".

Chris Hornback
Director, Regulatory Affairs



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Chris Hornback
Director, Regulatory Affairs