



Association of
Metropolitan
Sewerage Agencies

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

January 30, 2004

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

Patrick J. Natale, PE, F.ASCE
Executive Director
American Society of Civil Engineers
1801 Alexander Bell Drive
Reston, Virginia 20191-4400

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

RE: PROPOSED NATIONAL WASTEWATER BLENDING POLICY

Dear Pat:

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

I understand that the American Society of Civil Engineers (ASCE) is opposing the Environmental Protection Agency's (EPA's) proposed national policy on peak wet weather flow blending at publicly owned treatment works (POTWs). Apparently, ASCE believes that blending should not be allowed because it constitutes poor engineering and compromises environmental quality. I ask ASCE to reconsider this position, which is directly counter to that of AMSA and many other municipal organizations.

Despite the fact that blending is a long-standing EPA-approved wet weather management practice, a final blending policy is critical to cities across the country to stem a dangerous tide of anti-blending enforcement and permitting actions. EPA's proposal clarifies that blending can be authorized in a POTW permit, and that blending is not an illegal bypass. With blending, municipalities can treat significantly increased wastewater volumes in wet weather and avoid serious adverse impacts on public utility operations and infrastructure. From an environmental and public health standpoint, blended effluent fully meets permit requirements and prevents sewer backups into homes and businesses.

ASCE's position is inconsistent with that of many national municipal organizations, including the National League of Cities, U.S. Conference of Mayors, National Association of Counties, National Association of Towns and Townships, the Water Environment Federation, as well as state municipal groups in California, New Jersey, Virginia, Maryland, Minnesota, Texas, Tennessee, South Carolina, and Florida, to name just a few.

I urge ASCE to support a final national blending policy, which benefits the very communities your members serve. Please contact me to discuss this matter.

Sincerely,

Ken Kirk
Executive Director

cc: AMSA Board of Directors, AMSA Wet Weather Committee