

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

December 12, 2000

Association of Metropolitan Sewerage Agencies

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Montgomery, AL

Executive Director Ken Kirk Mr. William A. Telliard Chief, Analytical Methods Branch U.S. Environmental Protection Agency Office of Water Ariel Rios Building (MC-4303) 1200 Pennsylvania Avenue, NW Washington, DC 20460

Dear Mr. Telliard:

The Association of Metropolitan Sewerage Agencies has reviewed and concurs with the joint comments on the Charge to Peer Reviewers and the Preliminary Report: Interlaboratory Variability Study of EPA Short-term Chronic and Acute Whole Effluent Toxicity Test Methods submitted by Utility Water Act Group (UWAG) and Western Coalition of Arid States (WestCAS). As you know, AMSA played a significant role in implementing the WET study by encouraging forty-three member agencies to sponsor laboratories participating in the study.

AMSA agrees with UWAG and WestCAS commenters that while the study had certain shortcomings in design and implementation, the study reveals important insights on WET testing. We encourage EPA to incorporate the recommended revisions to its Charge to Peer Reviewers and preliminary report, as well as provide the UWAG and WestCAS comments directly to the peer reviewers. AMSA believes that recommendations will assist peer reviewers and make for a more comprehensive analysis of how the WET test method results were analyzed and assessed, and incorporated into the final study report.

Sincerely,

Mark Hoeke

Director, Government Affairs

cc:

Steven J. Koorse

Norm LeBlanc, HRSD

Peter Ruffier, City of Eugene

