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Association of
Metropolitan
Sewerage Agencies

June 10, 2004

Attn: Docket ID No. ORD-2004-0004
ORD Docket
EPA Docket Center
U.S. Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

VIA ELECTRONIC MAIL: ORD.Docket@epa.gov

Dear Sir or Madam:

The Association of Metropolitan Sewerage Agencies (AMSA)¹ appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA or Agency) Notice of Availability of and Opportunity to Provide Comment on Issues in the Staff Paper: *An Examination of EPA Risk Assessment Principles and Practices* (69 Fed. Reg. 15326; March 25, 2004). AMSA understands that this staff paper reviews EPA's methods for conducting risk assessments and is the first step in a multi-step process to engage interested stakeholders in dialogue regarding the Agency's risk assessment principles and methodologies. Given the critical nature of these issues, AMSA is requesting that EPA accept comments on the paper and associated risk assessment principles beyond the comment period deadline.

AMSA's members are "end users" of the standards and criteria that are developed by EPA using various risk assessment methodologies and are, therefore, very interested in the assumptions, default values, and uncertainty factors that go into conducting such assessments. Wastewater

¹ Founded in 1970, AMSA represents the interests of nearly 300 of the nation's publicly owned wastewater 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 every day.

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treatment utilities must comply with, among other things, their National Pollutant Discharge Elimination System (NPDES) permit limits that may be based on Clean Water Act Section 304(a) water quality criteria or pollutant concentration limits for their biosolids, both of which are derived using Agency risk assessment methodologies.

AMSA is very interested in being part of EPA's ongoing dialogue on these issues. Unfortunately, AMSA does not have the in-house expertise to review and submit comments to the Agency on the staff paper in such a short amount of time. Since the staff paper will not be revised further based on comments received and the release of the paper is only the "first step" in a multi-step process, rather than request an extension to the comment period, AMSA respectfully requests that EPA provide notice to interested parties that it will accept comments on the staff paper and other Agency risk assessment principles beyond the June 23, 2004 deadline. AMSA is currently evaluating its options for preparing detailed comments on the staff paper and would like the opportunity to provide this input to the Agency in the context of its ongoing dialogue.

Thank you for considering our request and we look forward to discussing these issues with you in the coming months. If you should have any questions, please do not hesitate to contact me at 202/833-9106.

Sincerely,



Chris Hornback
Director, Regulatory Affairs