

March 6, 2006

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General Manager
Hampton Roads
Sanitation District
Virginia Beach, VA

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Director
Independence Water Pollution
Control Department
Independence, MO

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Public Works General Counsel
City of Los Angeles
Los Angeles, CA

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Director of Planning
& Coordination
Massachusetts Water
Resources Authority
Boston, MA

EXECUTIVE DIRECTOR
Ken Kirk

Mary Smith
Director, Engineering and Analysis Division
Office of Science and Technology
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Mary:

The National Association of Clean Water Agencies (NACWA)¹ understands that the U.S. Environmental Protection Agency (EPA) is embarking on a sampling effort at a number of publicly owned treatment works (POTWs) in order to get an idea or fingerprint of the range of pollutants entering the headworks and the removal efficiencies of the facilities. We have had several conversations with you and members of your staff and understand that the Agency is currently looking at only eight or nine facilities. We also understand that this effort may be a prelude to a broader study of POTWs and their removal efficiencies – something that NACWA strongly supports.

While sampling eight or nine facilities may provide some interesting data points into the influent loadings and removal efficiencies at various POTWs, NACWA does not think this limited effort alone would be a sufficient exercise. We believe the sampling effort should be expanded to a full-fledged update of the *Fate of Priority Pollutants in Publicly Owned Treatment Works* study from September 1982, also known as the “50 POTW Study.” NACWA and its member agencies would like to offer our assistance in making this happen by providing the Agency access to our facilities and to years of data, which meet EPA’s standards for quality assurance and quality control. This data is statistically robust since it is done by hundreds of POTWs at least annually and is the best measure of the efficiency and effectiveness of the control technologies used in POTWs today.

As you know, the 1982 Study evaluated the performance of 50 POTWs in order to characterize the fate and occurrence of 129 pollutants in influent, effluent, and sludge. The data provides the basis for pass-through determinations that are critical to setting appropriate local limits for the pretreatment program. Because the current study is nearly 25 years old, the removal efficiencies, physical parameters, process data, and, most importantly, analytical techniques, are often no longer valid. A new study with new information is necessary to understand how best to ensure the effectiveness of pretreatment

¹ Founded in 1970, NACWA represents the interests of nearly 300 of the nation’s publicly owned treatment works (POTWs). NACWA 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.

programs and POTWs in protecting the water quality of the nation's rivers, lakes, and streams.

While the current sampling effort is laudable in terms of the sheer number of constituents, we question its value and relevance since the small number of samples certainly is not statistically representative of the nation's POTWs. We understand that the small number of facilities being sampled is due to EPA's resource limitation. With that in mind, NACWA is prepared to support EPA in a number of ways, including providing EPA with a large quantity of relevant information that could be used to update the 50 POTW Study. This information is, in fact, EPA's data since all POTWs provide copies of monthly effluent reports and annual pretreatment reports to EPA offices. NACWA's offer is simply to assist in organizing the data in a manner that would most help your sampling effort.

Regardless of the number of POTWs EPA plans to sample, the Agency should choose a representative mix of levels of treatment and technologies at POTWs from among the approximately 1,500 approved pretreatment programs. In addition to levels of treatment, EPA must also consider the nature and percent of industrial flow and not select POTWs with disproportionately high or low industrial loading that might skew the overall removal efficiency results. This concern is magnified if only a small number of POTWs are sampled. Removal efficiencies that are calculated with non-representative data can result in efficiencies that are too high and may result in local limits that may not be protective of a treatment plant, its biosolids, or the receiving stream. Conversely, if the removal efficiencies are too low, they may result in local limits that cannot be supported from a technical and water quality standpoint. Wastewater agencies throughout the country want to be able to develop local limits based on sound science that are protective of their treatment plants and the environment while at the same time are fair and technically supportable and not needlessly costly on their community.

We have had several positive and thoughtful conversations with Woody Forscht of your staff about this matter and look forward to working further with him and you to refine the process for selecting facilities for further study. NACWA would like to be involved as much as possible in helping EPA in the next phase of the current sampling effort. We would also like to discuss with you further our desire to make this a true update of the 50 POTW Study through accessing the extensive data on priority pollutants that are analyzed on a routine basis at POTWs throughout the country. We are available to coordinate this effort with you and provide support to move along any additional sampling, particularly of the emerging pollutants, that your staff may be interested in including in this effort.

Thank you for your consideration of this matter and we hope to be able to meet with you at your earliest convenience. If you have any questions or need more information, please contact Martie Groome, the laboratory and industrial waste supervisor for the City of Greensboro, N.C. She will be our new contact on this issue and can be reached at martie.groome@ci.greensboro.nc.us or at (336) 433-7229. You may also contact Ben Horenstein, the director of environmental services at the East Bay Municipal Utility District, at bhorenst@ebmud.com or at (510) 287-1846. I can be reached at (202) 833-3280 or at sbruninga@nacwa.org.

Sincerely,

Susan Bruninga
NACWA Manager of Regulatory Affairs

CC: Woody Forscht, EPA
Bennett Horenstein, East Bay Municipal Utility District
Martie Groome, City of Greensboro, NC