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September 6, 2005

Docket ID: OW-2004-0035  
EPA Docket Center  
U.S. Environmental Protection Agency  
Water Docket (Mail Code 4101T)  
1200 Pennsylvania Ave., NW.  
Washington, DC 20460  
Via Electronic Mail: *OW-Docket@epa.gov*

Dear Sir or Madame:

On September 1, 2005, representatives from the National Association of Clean Water Agencies (NACWA) met with U.S. Environmental Protection Agency (EPA or Agency) Office of Water staff to discuss the Agency's information collection activities related to the drinking water treatment facility effluent guideline effort (July 5, 2005; 70 *Fed. Reg.* 38675). During that meeting, NACWA members provided EPA officials with verbal comments on the content of both the screener survey and the detailed questionnaire. This letter formally transmits those verbal comments to the Docket for this information collection request.

NACWA's most fundamental comment was that neither survey recognized that many water and wastewater agencies have long histories of working together to manage the myriad wastestreams generated in the process of treating drinking water. These arrangements have been appropriately controlled through local limits as well as other provisions of approved pretreatment programs as needed. In addition, the surveys were focused primarily on the solids generated from the process, but there are other wastestreams that are also generated and usually discharged to wastewater treatment plants. These other wastestreams are discussed below.

NACWA also commented that wastes discharged to a wastewater treatment plant are not always discharged simply to the sewer system where they enter the headworks of the wastewater treatment plant. In some cases, wastes enter the wastewater treatment process at different points, depending on the makeup of the waste. For example, some wastewater treatment plants that handle drinking water treatment solids have established a system where they directly co-manage the drinking water solids with their solid wastes.

The detailed comments below include suggested revisions to the surveys to address the issues discussed above:

- Section 3 - Residuals Destination Codes should include a code POH for POTW – Headworks and a code POSH for POTW – Solids Handling.
- Section 3.1 - Schematic does not reference anything about the addition of Zinc Ortho phosphate.
- Section 4 - Suggest the addition of a question after 4-1 that reads “Does your facility discharge residuals to POTW headworks, solids handling or both?”
- Section 4-3 - Suggest section start with the question “Does your facility have an indirect discharge permit?” Then, if yes, provide permit number and date of permit.
- Section 4-4 and Question 10 of the Screener Survey - Suggest addition of other possible wastestreams including: laboratory wastewater, regeneration water from water softener for boiler make-up, chlorine analyzer wastewater, equipment wash-down wastewater, contact and non-contact cooling water, boiler blow-down and raw water pumping from sample collection.
- Section 4-11 - Suggest item J be modified to “Haul or Pump to POTW/PrOTW/FOTW/CWT.”
- Table 4-11 - Suggest item J include Haul/Pump to POTW/PrOTW/FOTW/CWT. Suggest Item A also include question “Does your facility dispose of residuals by hauling or pumping to a POTW, PrOTW, FOTW or CWT?” Item I should reference “Percent solids of sludge hauled or pumped to facility.”
- The following pollutants could be added to Section 2-5 (except for TCLP) and Section 4-14: TKN, Total Solids, Volatile Suspended Solids and TCLP. Also Nitrate should be revised to Nitrate-Nitrite.

NACWA appreciates the opportunity to comment on this information collection request. Please contact me at 202/833-9106 if you have any questions.

Sincerely,



Chris Hornback  
Director, Regulator Affairs