

FROM :

FAX NO. :

Oct. 03 2003 01:21AM P1



The National Grassroots Organization of Republicans for Environmental Protection

April 7, 2004

The Honorable Lincoln Chafee  
 United States Senate  
 Washington, DC 20510

Dear Senator Chafee:

I'm writing to ask you to sign the Dear Colleague letter (attached) that Senators Jeffords and Graham have written regarding the EPA's proposed new policy about *sewage blending*, and also that you circulate it among your Republican colleagues to try to get them to sign it, too.

REP America's Board of Directors is unanimously opposed to this proposed change, which would put more bacteria, viruses, and parasites into our environment and greatly increase the risk to the public of contracting waterborne illness. We would like to see the effort to resist the proposal become a bi-partisan issue in the Senate, just as it has been in the House of Representatives.

As you may know, this is an attempt by EPA to eliminate the current requirement that sewage receive full treatment before discharge (except where such treatment is not feasible, such as extreme storm events). It would put a higher load of environmental contaminants into our waterways and coastal wetlands—toxic chemicals, pet wastes, solids, oxygen-depleting substances—everything that is in the sewage that flows from homes, businesses, and industrial dischargers into sewage treatment plants.

We at REP America see no excuse for allowing such a backwards policy to take effect in the 21<sup>st</sup> century. The Environmental Protection Agency should be working to make significant improvements in the quality of our water, not diminish it.

I hope that you agree and respectfully ask that you sign and circulate the attached letter. Thank you!

Sincerely,

Martha A. Marks  
 President

Encl: two-page letter

FROM :

FAX NO. :

Oct. 03 2003 01:21AM P2

April xx, 2004

Administrator Michael Leavitt  
Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

Dear Administrator Leavitt,

We are writing to you regarding the EPA's proposed guidance entitled "National Pollutant Discharge Elimination System (NPDES) Permit Requirements for Municipal Wastewater Treatment Discharges During Wet Weather Conditions," which was published in the Federal Register on November 7, 2003 (68 FR 63042)(EPA Water Docket, ID # OW-2003-0025). This policy would permit a process called "blending" which mixes partially treated sewage with fully treated sewage and discharges it directly into receiving waters. We recognize that in extremely limited circumstances, when no feasible alternatives exist, blending may provide an important, temporary solution to water quality problems associated with peak wet weather flows. However, we are concerned that the EPA's proposed policy puts public health at risk because it would allow the more frequent use of blending.

The main concern with the increased use of blending is its effect on the presence of bacteria, viruses, and pathogens in wastewater discharges. Some familiar examples commonly found in wastewater are cryptosporidium, E. Coli, and giardia, all of which cause intestinal illnesses of varying severity. A huge cryptosporidium outbreak in Milwaukee, Wisconsin in 1993 caused more than 400,000 people to become ill and more than 100 people died. Secondary treatment and disinfection are the two processes most critical to reducing their presence.

The proposed blending guidance would allow water that receives only primary treatment to bypass the secondary treatment process and be discharged into receiving waters. Disinfection is not required by the proposed guidance as a condition of the use of blending, and it is not consistently required in areas where human contact with water is expected. Because EPA's proposed guidance increases the allowable uses of blending, it increases the likelihood that bacteria, viruses, and pathogens present in wastewater flows

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FROM :

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entering treatment plants will be discharged and will come into contact with people through swimming or drinking water.

In addition, the Agency's blending guidance undermines the 1994 EPA CSO policy which requires, as part of a long-term control plan, the evaluation of alternatives to eliminate CSOs. By expanding the potential use of blending it is likely that more communities will select blending instead of other alternatives with greater water quality benefits. The result will be a missed opportunity to clean up the nation's CSO discharges.

The public health ramifications of moving forward with the proposed blending guidance issued by the Agency on November 7, 2003 should not be ignored. We urge you to end consideration of this guidance.

Sincerely,