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Metropolitan
Sewerage Agencies

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October 10, 2003

Water Docket
U.S. Environmental Protection Agency
Mailcode 4101T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
Attention Docket ID No. OW-2003-0075

Re: *Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Centralized Waste Treatment Point Source Category; Proposed Rule, 68 Fed. Reg. 53431 (September 10, 2003)*

Dear Sir or Madam:

The Association of Metropolitan Sewerage Agencies (AMSA) is pleased to provide comments on the U.S. Environmental Protection Agency's (EPA's) *Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Centralized Waste Treatment Point Source Category; Proposed Rule*. Founded in 1970, AMSA represents the interests of nearly 300 of the nation's publicly owned 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 each day. As key stakeholders in the effluent limitations guidelines (ELG) program, AMSA members continue to oversee implementation of EPA's categorical pretreatment standards and are actively engaged in the national dialogue on the development of those standards. At the same time, AMSA members along with thousands of other POTWs continue to develop and implement local programs tailored to the specific water quality needs of their communities.

AMSA fully supports EPA's proposal to delete certain metal limits from the regulations for the Centralized Waste Treatment (CWT) Point Source category. These metal limits, specifically selenium in the Metals Treatment and Recovery subcategory, and barium, molybdenum, antimony, and titanium in the Oils

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Treatment and Recovery subcategory have been shown to be technically unachievable and therefore, unwarranted. Most importantly, these metals do not pass-through or cause interference at POTWs. However, in the rare cases where needed, local limits have been successful for POTWs at regulating CWT discharges for many years.

For the same reasons, AMSA urges the Agency to take similar action to remove the molybdenum limitations from the Organics Treatment and Recovery subcategory as considered in the proposed rule. AMSA, along with several industry stakeholders, met with EPA on August 7, 2003, to discuss this idea. At the meeting, additional data were submitted by several CWT facilities demonstrating that removal of molybdenum and other metals was neither consistent nor effective using the Agency's model technology, equalization and biological treatment. These data presented to the Agency, coupled with the fact, as many POTWs have already noted, that biological treatment is not an efficient method to remove metals from wastestreams, should support the Agency's removal of these limits. Again, in the instances where needed, local limits have been effective at controlling molybdenum.

While AMSA's primary concerns, as outlined above, center on scientific/achievability issues, AMSA is also concerned with the monitoring costs that POTWs, who often monitor much more frequently than semiannually as the CWT ELG requires, would incur should molybdenum not be removed from the Organics subcategory. Thus, not only does removing this molybdenum limitation make scientific sense, it also makes sound economic sense.

Finally, AMSA appreciates that the Agency provided recommendations on several approaches for implementing the CWT pretreatment standards to account for changes in the rule given the short timeframe allowed before the regulations will become final. However, there will likely still be confusion for POTWs and industrial wastewater dischargers. AMSA encourages the Agency to take final action on the proposal and provide implementation guidance to POTWs and the regulated community as soon as possible.

Thank you again for the opportunity to comment on this critical effort. If you have any questions about our comments please do not hesitate to call me at 202/833-9106.

Sincerely,



Chris Hornback
Director, Regulatory Affairs