

# Washington Suburban Sanitary Commission

14501 Sweitzer Lane • Laurel, Maryland 20707-5901

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January 6, 2012

Mr. Robert Perciasepe  
Deputy Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., NW  
Mail Code 1101A  
Washington, DC 20460

Dear Deputy Administrator Perciasepe:

On behalf of the Washington Suburban Sanitary Commission (WSSC) and the 1.8 million residents we serve in Prince George's and Montgomery Counties in Maryland, I am writing to thank you for spending your valuable time meeting with my staff and their colleagues from NACWA on December 20, 2011. I had hoped to attend the meeting myself but had a family engagement out of town that could not be avoided. The Sewage Sludge Incineration (SSI) Rule published earlier this year is of great importance to the WSSC and I hope the information provided at the meeting was helpful to you. I would like to provide you with additional information from the WSSC to consider as you review the SSI final rule. WSSC and EPA are partners in providing essential water and wastewater services to the public and we take our role very seriously.

WSSC, like many of our colleagues throughout the nation, cannot consider SSI or any other challenge we face in isolation. Incineration is part of an overall biosolids management program that considers many factors including environmental impact, costs, budgetary constraints, and regulatory burdens. During a period of time when municipalities are facing enormous economic challenges in an ever-expanding regulatory landscape, it is critical for EPA to ensure its policies are environmentally and economically sound, and ensure those policies allow utilities to manage their limited resources wisely and engage in practices that can maximize their resources while limiting their carbon footprint. The 2011 EPA SSI Rule does not, in our opinion, strike that balance. As a not-for-profit combined water/wastewater utility facing billions of dollars in infrastructure investments with no identified revenue stream beyond the shoulders of our ratepayers that includes the federal government, every

regulatory decision that costs additional dollars must be weighed and scrutinized along with our other burgeoning priorities.

The WSSC generates over 250,000 wet tons of sewage sludge annually. Approximately 165,000 tons are produced at the Blue Plains WWTP in Washington, DC. The remainder is produced at WSSC facilities located within Prince George's and Montgomery Counties in Maryland. At the present time the vast majority of this sludge is treated with lime, creating biosolids for land application. The one exception is the approximately 25,000 wet tons annually produced at the Western Branch WWTP where disposal occurs mainly through incineration using two multiple hearth incinerators. These incinerators were constructed in 1977 using Clean Water Act Construction Grant Funds and are wholly integrated into the solids handling and treatment processes at the POTW.

The ability to dispose of biosolids within Maryland is diminishing with fewer allowable sites for land application. The Maryland General Assembly continues to debate further restrictions on the land application of biosolids, which can be both costly and problematic to wastewater utilities providing a critical public service. Currently about 85% of WSSC biosolids are transported over one hundred miles into the Commonwealth of Virginia. Should Maryland succeed pushing land application options further and further from the generating plants, utilities will face enormous investment costs to deal with the necessary storage and trucking requirements over long distances. Coupled with the new EPA SSI Rule utilities utilizing incineration as part of their overall biosolids management program could be forced to abandon incineration as early as 2016. Loss of incineration as a viable management option will have major economic consequences, eliminate a major green energy source, and result in a transfer of emissions from SSIs to the tens of thousands of trucks that will be needed to haul the nation's sludge to landfills or other disposal sites across the county. This could expose the public to increasing risks, potential adverse environmental impacts and rising costs as the transportation mileage increases.

WSSC is serious about our environmental stewardship responsibilities and recently spent \$6.5 million on a project to lessen emissions from our two incinerators and reduce natural gas consumption by 75%. Preliminary estimates indicate that compliance with the new SSI rule will cost WSSC ratepayers approximately \$12 million in capital costs and an additional \$100,000 annually in added operational and maintenance costs. These costs will adversely affect the investment recently made and make it more difficult to justify continuance of this option in the face of any present-day negative economic argument. I cannot imagine a bleaker point in time when EPA could impose additional costs on local communities already faced with substantial Consent Decree investments,

Mr. Robert Perciasepe  
January 12, 2012  
Page 3


infrastructure renewal programs, and escalating operational expenses to simply maintain the services we currently provide. In the last nine years including the proposed budget for our next fiscal year, WSSC ratepayers have experienced a cumulative 73% rate increase. Our proposed annual operating budget is \$1.2 billion with an associated six-year capital budget of \$3.2 billion. While the numbers associated with our incinerators may seem small in comparison, every \$5 million represents an approximately 1% rate increase to our ratepayers also facing foreclosure, unemployment, and other fiscal constraints. With little to no federal funding assistance available to assist ratepayers in shouldering these unfunded mandates, the pile on effect is bearing down upon our everyday citizens.

The WSSC believes that utilities must have environmentally and economically sound biosolids management programs with decisions made at the local level to set priorities. We are committed to working with our federal partners including the EPA to ensure we are protecting the public we serve in the most fiscally responsible manner possible.

Again, we encourage you and your staff to call upon us if we can provide any additional information to you. We also invite you to visit our facilities to "kick the tires" yourself to better understand the real world impacts of the decisions made in Washington.

Thank you for your dedication and attention to water quality and our industry as a whole. I know that you have long ties to Maryland and the WSSC. Please know that we always stand ready to serve as a resource to our federal partners on this or any other issue. If you need any additional information in the meantime, please feel free to contact me at 301-206-8777 or my e-mail at [GMCEO@wsscwater.com](mailto:GMCEO@wsscwater.com).

Sincerely,



Jerry N. Johnson  
General Manager/CEO