



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 12 2016

OFFICE OF WATER

Chris Hornback
Chief Technical Officer
National Association of Clean Water Agencies
via electronic mail

Subject: Response to letter of August 01, 2016 regarding National Study of Nutrient Removal and Secondary Technologies.

Dear Chris,

We very much appreciate your taking the time, on such short notice, to provide us with comments from NACWA on the screener questionnaire, the first phase of the National Study of Nutrient Removal and Secondary Technologies. We are already working to revise the screener questionnaire based on many of the suggestions and observations you have provided, and there will be at least a couple of months to review and discuss subsequent revisions to the screener questionnaire during the public comment period. We hope you will continue to help us with the screener survey development over this time.

The goals of this nationwide study are to evaluate the nutrient removals and related technology performance by different types of publicly owned treatment works (POTWs). As part of this study, EPA will share statistically representative data on the profile and performance of all POTWs across the country. The study is designed to occur in phases over the course of four to five years. The first phase of the study involves the screener questionnaire, and that is our primary focus here. The screener questionnaire is considered a "stand alone" effort with respect to the Office of Management and Budget approval process. Design of additional phases of the study, including a detailed questionnaire and influent/effluent sampling of a statistically meaningful subset of secondary treatment facilities, would begin next year. Implementing the survey would span approximately another two years. We fully expect to have detailed technical discussions with your members in each phase above and beyond the comment period included in our Federal Register notices.

The multi-phase study, when completed, we believe will provide a rich database of nutrient removal performance at secondary treatment POTWs nationwide, and will help POTWs better understand the range of nutrient removal performance and opportunities to optimize nutrient removals based on data from their peers. It will also serve as a resource for POTWs, states and stakeholders to evaluate the most cost effective approaches to nutrient reduction at the watershed scale, and this information will help states and POTWs agree to and set well-informed and

realistic nutrient load reduction targets for wastewater treatment facilities where appropriate, providing information on the time and costs needed to make enhancements in operation and maintenance procedures.

The first phase, a census, will provide information to fill in gaps in our databases and more importantly to provide information required to successfully stratify the next phases of the study – the detailed questionnaire followed by sampling. To our knowledge, there is no comprehensive database in existence that provides this basic information. This screener is designed to identify the entirety of the POTW universe to provide:

1. Basic information regarding location, (which can include geography and climate)
2. Service population, design flow, flow capacity
3. Type of collection system
4. General treatment system description
5. Information on any nutrient removal technologies in place

With that brief background we can now respond to your comments and suggestions.

We note the concern expressed regarding our intention to use 308 authority to require response to this survey. Much deliberation went into this decision. Key to our decision are the goals of the overall study and the concern that voluntary submission or self-selection could result in a low or unrepresentative survey response rate. We note your concern about the potential for this information to become part of an enforcement action. We hope it is clear by virtue of the specific questions being asked that the information is not being collected for purposes of enforcement or to compel facilities to submit information regarding activities that might be potential violations of their permits. We noted your comments regarding questions that may not pertain to nutrient removal performance, including your concerns on questions pertaining to bypass, and have deleted those questions accordingly. EPA's Office of Water intends to use the information provided by respondents to the screener survey for research and statistical purposes only. It is our intention to compile this information into a database that will be used as the basis for subsequent data collection to obtain more detailed information about the operations at secondary treatment systems and the nutrient removal performance on a national basis. EPA is open to conducting future data collection efforts associated with this study without the use of 308 authority and will continue to work with NACWA and others to identify ways to collect the data we believe is needed in the most effective way possible.

NACWA recommends that EPA draft and pilot the follow-up, detailed survey now before conducting the screener survey. We agree conceptually that the subsequent study phases should be well in mind before sending out the initial screener, keeping in mind that changes can be made to latter stages as we learn more. Our concern with a pilot of the detailed survey at this time is that a database is needed first to identify the sub-population of facilities that will be the focus of this study. There are several pre-testing procedures already under consideration as the full study design evolves. During the public comment period, we are considering an evaluation

of the draft screener survey using data that are available from facilities which participated in the Clean Water Needs Survey. This pretesting was used effectively in our Targeted National Sewage Sludge Survey for bio-solids. We can also conduct a pretest of the initial drafts of the detailed survey to determine whether respondents are interpreting questions as intended.

NACWA also poses the question of whether a national survey is the best way to collect the type of information EPA desires. We disagree that substituting a larger set of case studies would have the same results as a well-designed survey. While case studies serve a purpose, there already exist a number of case studies to provide information for those looking to see how some facilities addressed nutrient concentrations. The past reliance on case studies to provide insight into nutrient removal has been a criticism levied against EPA. NACWA recently made this very criticism in its December 15, 2015 letter regarding EPA's "Case Studies on Implementing Low-Cost Modifications to Implement Nutrient Reduction at Waste Water Treatment Plants." Further, we spoke with several academics at the Water Environment Federation nutrient conference all of whom agreed that a statistically representative survey was the best way to proceed to meet our stated goals. We share your concern regarding "sufficient granularity" in the screener. Fortunately, the screener is only the first step in obtaining the "granularity" desired for such a national study. In designing the screener questionnaire we have to balance the requirement for detail with the need to minimize the burden of filling out the questionnaire. The screener is not set in stone, and we value any constructive suggestions you can make to provide granularity while minimizing burden.

In regard to your comments about specific questions in the draft survey we have accepted all of the comments you have provided. We appreciate this feedback, as we very much want to make this survey understandable and as easy to respond to as possible.

Thank you once again for your time and effort in providing us these initial comments and suggestions. Obviously, there will be more time for constructive dialogue on the design and content of the screener questionnaire as it moves through the public comment period. Moreover, we anticipate having extensive discussions with you when we can all review the database created by the census.

Sincerely,

A handwritten signature in blue ink, reading "Elizabeth Southerland".

Elizabeth Southerland, Director
Office of Science and Technology