



November 4, 2014

Damon Highsmith
Engineering and Analysis Division
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-001
Via email: highsmith.damon@epa.gov

RE: Comment Extension Request, *Effluent Limitations Guidelines and Standards for the Dental Category*, Docket ID EPA-HQ-OW-2014-0693

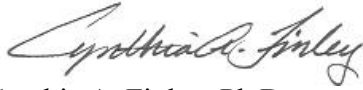
Dear Mr. Highsmith:

The National Association of Clean Water Agencies (NACWA) and the American Dental Association (ADA) respectfully request a 60-day extension of the comment period for the proposed rule, *Effluent Limitations Guidelines and Standards for the Dental Category*, published on October 22, 2014 (79 *Fed. Reg.* 63258). This rule will affect over 100,000 dental offices and thousands of publicly owned treatment works (POTWs) across the country and NACWA and ADA will need additional time to collect information and data from their respective members to better understand the potential impact of the rule. Given the long history involved with this issue, including an earlier decision by EPA that effluent guidelines were not necessary for the dental category, NACWA and ADA believe that the proposal demands careful and thoughtful review. To do this, both NACWA and ADA will need additional time to reach out to members, collect data, and then compile that information into comments. In addition, EPA documents are still being added to the docket on www.regulations.gov, and additional time is needed to review all of the supporting information before completing a thorough review of this significant proposed regulation.

NACWA and ADA continue to work closely on this issue to ensure that mercury discharges are controlled in the most cost effective manner possible. It is essential that any national rulemaking not upset the tremendous progress that has already been made in addressing mercury from the dental category. NACWA and ADA believe that the current 60-day comment period is insufficient for collecting the information needed to fully evaluate EPA's proposal and ask that the Agency extend the comment period deadline by an additional 60 days.

Thank you for your consideration of this request. Please contact Cynthia Finley at cfinley@nacwa.org or Jerry Bowman at bowmanj@ada.org if you have any questions.

Sincerely,



Cynthia A. Finley, Ph.D.
Director, Regulatory Affairs
NACWA



Jerry Bowman
Chief of Governance and Strategy Management
ADA

CC: Rob Wood