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March 8, 2002

Brian Frazer
EPA Project Officer
Water Permits Division
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave. NW MC4203
Washington, DC 20460

Re: Assistance ID No. CX827577-01-0

Dear Brian:

This letter transmits the final technical report for the project titled "Evaluation of the Effectiveness of Publicly Owned Treatment Works (POTW) Mercury Pollution Prevention/Minimization Programs." Attached, please find the Executive Summary, Final Report, and appendices, which include a document providing detailed responses to all comments raised by members of the project's oversight committee.

When initiated, this project had very concrete goals: evaluate the effectiveness of POTW pollution prevention (P2) programs for reducing mercury loadings to POTWs, and determine if these reductions could enable POTWs to comply with new, lower effluent limits for mercury. The project clearly demonstrated that mercury source control and P2 programs have the potential to achieve measurable reductions in POTW influent, and to have positive impacts with respect to reducing other environmental releases of mercury.

During the project performance period, it became evident that a number of other questions would need to be answered before a definitive statement could be made about the ability of POTWs to consistently meet low mercury effluent limits using only mercury source control or P2 programs. Given the scope of this project,

assumptions were made to address these unanswered questions based on the best available information. Each of these assumptions is acknowledged as a limitation of the analysis and is highlighted as an area demanding additional study.

The assumptions that impacted the study results the most were the values assumed for dental discharges and human waste associated with dental amalgam, as these were by far the largest mercury sources for the case studies evaluated. The exact values for these parameters were debated at length by the project oversight committee. The majority of the committee was able to reach consensus on the values ultimately used in the report, as it became evident that the values, while impacting the estimated load reductions and resulting effluent concentrations, had no significant impact on a POTW's ability to comply with effluent limits or on the cost to comply with these limits.

One member of the committee did not agree with the values assumed for dental discharges and human waste, arguing that the dental number was too low and the human waste number was too high. To address these concerns, it was decided that the final report would include a sensitivity analysis to evaluate how the study results were affected by these two parameters. In addition, a section was added to the report to provide a detailed response to all major comments received, indicating how the comment was resolved and any necessary explanation.

Overall, AMSA considers this project a success. Clearly, mercury source control and P2 will play a key role in efforts to reduce mercury loadings to POTWs, but the extent to which they will enable POTWs to meet increasingly stringent effluent limits appears limited. The fact that many questions remain unanswered is a testament to the complexity of the issues surrounding mercury in the environment. These and other unanswered questions regarding the behavior of mercury in the environment will need to be addressed before we fully understand how to curb releases of mercury to the environment.

AMSA appreciates the opportunity to conduct this critical study and looks forward to collaborating with the Agency to tackle the issues identified for further study. If you have any questions about the content or format of the report please contact me at 202/833-9106 or chornback@amsa-cleanwater.org.

Sincerely,



Chris Hornback
Director, Regulatory Affairs

cc: Project Oversight Committee
Jeff Lape, EPA