



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OCT 20 2016

Dear Sir or Madam:

OFFICE OF WATER

I am writing to make you aware of a study entitled the National Study of Nutrient Removal and Secondary Technologies that the U.S. Environmental Protection Agency (EPA) Headquarters office is initiating to evaluate nutrient control at secondary treatment facilities. As part of this study, EPA intends to conduct a census of all publicly owned treatment works (POTW) in the U.S. to collect nationally representative data on POTW treatment performance.

The EPA has recently published a Federal Register Notice containing the proposed information collection request for the initial census for all treatment plants. More information about the census, a draft of the questionnaire, and directions on submitting public comments can be found at the study's website, <https://www.epa.gov/eg/national-study-nutrient-removal-and-secondary-technologies>. I encourage you to review these materials and provide comment regarding any concerns you may have. The comment period for this notice closes on November 18, 2016.

Nutrient pollution is a current and growing threat to public health and local economies: excess nutrients contribute to harmful algal blooms which have already impacted drinking water, closed beaches and affected local economies all across the nation; nitrogen contamination of drinking water, which can be dangerous for infants, occurred in many communities last year; and an alarming proportion of the Nation's waters have nutrient levels associated with harmful ecological impacts. See EPA's most recent strategy for addressing the nutrient problem in partnership with states, available at <https://www.epa.gov/sites/production/files/2016-09/documents/renewed-call-nutrient-memo-2016.pdf>.

As more states adopt nutrient frameworks and strategies, wastewater treatment facilities, both major and minor, are expected to play an important part in addressing nutrient issues. This National Study of Nutrient Removal and Secondary Technologies will provide critical information needed for POTWs, states, tribes and EPA to work together to identify realistic and achievable nutrient reduction strategies – particularly lower-cost operation and management strategies – for POTWs of different sizes across different geographical locations with different treatment technologies.

While equipment upgrades are one way to tackle nutrients, such upgrades can be capital intensive. Fortunately, studies have shown that operation and management practices are available that many facilities across the country may be able to apply to improve nutrient removal at low or minimal cost. These practices also provide simultaneous benefits like improved process stability and reduced energy usage. EPA's Case Studies on Implementing Low-Cost Modifications to Improve Nutrient Reduction at Wastewater Treatment Plants outlined 12 case studies documenting such practices and their benefits (<https://www.epa.gov/nutrient-policy-data/case-studies-implementing-low-cost-modifications-improve-nutrient-reduction>).

These 12 case studies cannot be extrapolated to all POTWs nationwide in addressing nutrient issues. Therefore, EPA has initiated this study to identify and validate practices that improve nutrient removal at POTWs across the country, determine the ancillary benefits, and characterize the types of facilities employing such practices. We hope to identify low-cost practices, improvements and benefits that may be available to secondary treatment facilities based on their similarities to facilities successfully reducing their nutrient discharges.

In order for the study to achieve the goal of providing statistically representative information on low-cost practices available to the diversity of wastewater treatment plants nationwide, EPA must first gather basic information on all municipal wastewater treatment plants in the nation to develop a national profile. Once this information is collected, EPA can select a statistically representative sample of treatment plants from the national population for further study.

In order to generate an accurate, comprehensive, national profile of treatment plants, the initial phase of the study will be a mandatory questionnaire, collecting basic information from all POTWs in the nation. The questionnaire is short and should only require between 1.5 to 3.5 hours to complete, as confirmed by engineers who have reviewed it.

A high response rate on this initial census is imperative to identify a statistically representative sample of treatment plants for further characterization. Therefore, EPA will use authority under Section 308 of the Clean Water Act for this census. It is important to emphasize that EPA is planning to use 308 authority for this census of POTWs for the sole purpose of ensuring a full response for research and information collection purposes only and to ensure a level of response adequate to support a statistically representative sample of plants for potential follow-up surveys, not for any enforcement purposes.

I encourage you to review this proposed information collection request and invite you to comment. EPA is soliciting comments through November 18, 2016.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Southerland". The signature is fluid and cursive, with the first name being the most prominent.

Elizabeth Southerland, Director
Office of Science and Technology