

October 29, 2007

Holly Stallworth, Ph.D.  
United States Environmental Protection Agency  
Science Advisory Board (1400F)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Dear Dr. Stallworth:

Subject: Comments on the August 30, 2007, Science Advisory Board Hypoxia Advisory  
Panel Draft Report

In addition to the comments submitted by the Metropolitan Water Reclamation District of Greater Chicago (District) regarding the May 24 draft report, we have an additional comment about the latest subject draft.

Page 96 discusses the calculation of nutrient point source loading to the Mississippi and Atchafalaya River Basin (MARB), and further assumes that the entirety of the “point source load is delivered to the Northern Gulf of Mexico (NGOM) without any in-stream losses.” Neglecting to consider in-stream denitrification results in a gross overestimate of loading from District water reclamation plants into the NGOM. The enclosed District reports contain addendums addressing the isotopic composition of nitrate along the Illinois Waterway, downstream of District effluent discharges. The data indicate that considerable denitrification occurs along the Illinois Waterway, such that the District contribution of nitrate nitrogen is significantly reduced by river mile 190 of the Illinois River (in the Peoria Pool).

On page 97, it states that “reduction in N fluxes from point sources may offer a certain and cost effective means of achieving some of the N reductions needed in the MARB.” Given the aforementioned overestimate of point source loading and the fact that the report does not include any kind of cost assessments for point or non-point nutrient control, the impact of point source reduction on the NGOM could hardly be described as “certain” or “cost effective.” The costs of construction, maintenance and operation, and energy associated with point source nutrient reduction are actually quite substantial. Perhaps a future report could include a cost estimate comparison of point source control and various best management practices for non-point sources.

Very truly yours,

Louis Kollias  
Director of Research and Development

LK:TG:JW:jvs  
Attachments  
cc w/o att.: Granato/O'Connor/Lordi