

EPA SAB Review on Nutrient Criteria
John Brosious
to: Thomas Armitage
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From: "John Brosious" <brosious@municipalauthorities.org>

To: Thomas Armitage/DC/USEPA/US@EPA

Dr. Armitage:

I am writing on behalf of the Pennsylvania Municipal Authorities Association (PMAA) about the upcoming Science Advisory Board review of Empirical Approaches for Nutrient Criteria Derivation. PMAA represents 715 authorities in Pennsylvania serving over 6 million residents statewide. Nearly 400 of our authorities are wastewater authorities that will be potentially impacted by new nutrient criteria from EPA. In fact, a number of our authorities are already impacted by the nutrient criteria EPA lists in the 5 recent TMDLs issued for small Pennsylvania streams.

We are appreciative of the fact that the SAB will convene to review these criteria and will be soliciting expert opinion on the issue. We are concerned however that the 5 minutes allocated to each of the "municipal" representatives presenting testimony is inadequate to fully cover the many aspects of this issue that impact us.

Pennsylvania authorities and municipalities have been engaged in legal and scientific research on this issue for some time. In particular, those authorities and municipalities have recognized the scientific findings of Thomas Gallagher, P.E. and Dr. Dominic DiToro, two national experts on this topic. The assumption that either of these gentlemen could present their findings in a 5-minute period is not realistic.

Along with others here in Pennsylvania, we are respectfully asking you to consider allowing these presenters, along with Bill Hall and Attorney John Hall, to be part of a panel that would have up to two hours to supply the SAB with scientific and technical documentation on this issue. We feel it would be in the best interest of all parties to allow a thorough presentation of the data compiled by these gentlemen as the SAB deliberates this critical issue.

Thank you for your consideration.

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