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November 25, 2019

Dr. Phillip Flanders
Engineering and Analysis Division
Office of Water

U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460
Submitted via www.regulations.gov

**Re: Docket ID EPA-HQ-OW-2018-0618, Preliminary Effluent Guidelines
Program Plan 14**

Dear Dr. Flanders:

The National Association of Clean Water Agencies (NACWA) appreciates this opportunity to comment on the Preliminary Effluent Guidelines Program Plan 14 (“Plan,” 84 *Fed. Reg.* 57019). NACWA represents the interests of over 320 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the US. NACWA members operate highly successful pretreatment programs as co-regulators under the Clean Water Act with EPA and the states, and are actively involved in efforts to reduce the quantities of pollutants that are discharged into the sewer system.

NACWA offers the following comments on the annual reviews and ongoing studies of industrial dischargers:

- **Nutrient Review** – NACWA appreciates EPA’s study of nutrient discharges from industrial categories and supports EPA’s continued review of the Pulp, Paper, and Paperboard category and the Meat and Poultry Products category. Given the widespread nutrient issues in the nation’s waters, it is important to understand all nutrient contributors. Since publicly owned treatment works (POTWs) are increasingly under pressure to reduce their own nutrient discharges, additional focus on the loadings from industries and potential pretreatment methods is important. However, any analysis of and decisions related to nutrient discharges from industries and POTWs should also consider the contributions of nonpoint sources, which can be the greatest source of nutrients in many watersheds. It is critical that EPA understand – and appreciate – the nutrient reduction efforts of POTWs for flows they can control as compared to the nutrient contribution from sources outside POTW control.

- **PFAS Review** – EPA’s current review of PFAS is essential in the ongoing national discussion on how to reduce the amount of PFAS in the environment, and NACWA strongly supports EPA efforts to address PFAS concerns. In the Plan, EPA states that it will conduct a detailed study of the PFAS use, treatment, and discharge by airports, organic chemical manufacturers, paper and paperboard manufacturers, and textiles and carpet manufacturers. NACWA asks EPA to also conduct studies on industries that typically discharge to POTWs and may have high levels of PFAS. Several NACWA members have sampled their industrial users to test for PFAS, and many industrial categories have PFAS concentrations that may be a concern. In addition to the industries that EPA will continue to study, industries such as landfills and metal finishing may also warrant additional study. NACWA and its members are willing to participate in further review of any categories with significant PFAS discharges and are eager to work with EPA to maximize the use of the pretreatment program to address PFAS concerns.
- **Electrical and Electronic Components (E&EC) Study** – NACWA supports EPA’s ongoing review of the E&EC category and encourages EPA to update the outdated pretreatment standards for this category. NACWA members report that the industry has changed dramatically since the effluent guidelines for this category were issued in 1983, and an update of the pretreatment standards would greatly benefit POTWs with E&EC facilities in their service areas.

Thank you for your consideration of these comments. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,



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