

US EPA ARCHIVE DOCUMENT

By First Class Mail  
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August 7, 2000

Mr. Matthew Gluckman, USEPA,  
77 West Jackson Blvd.  
Chicago, Ill. 60604

Mr. Chad Carbone  
USEPA, Room 1027WT (1802)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

Re: **Project XL Draft Final Project Agreement**  
**Metropolitan Water Reclamation District of Greater Chicago**

Dear Mr. Gluckman and Mr. Carbone:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on Greater Chicago's Project XL plan. MWRA is an independent authority created by the Massachusetts legislature to provide sewer service to 43 cities and towns in eastern Massachusetts and two communities in central Massachusetts.

MWRA applauds the regulatory flexibility measures proposed by Chicago. MWRA believes that the changes that Chicago is undertaking will produce a more efficient program with better environmental results. MWRA would, however, recommend examining not only non-regulated priority *pollutants* that may be of concern, but also currently unregulated *sources*. MWRA has found that even regulated pollutants escape control in significant amounts when the sources are small and diverse. Facilities that MWRA has historically not regulated, such as dental offices, can discharge significant concentrations of mercury, copper and lead, as well as unregulated substances of potential concern. MWRA therefore suggests that the proposed ATRAPs program might be expanded to encompass such facilities.

If you wish to discuss MWRA's comments, please feel free to contact Charles Bering, MWRA Senior Counsel, at (617) 788-2309.

Sincerely yours,

Kevin McManus, Director  
Toxic Reduction and Control Dept.

cc: Jay Pimpare: EPA, Region I