

December 29, 1999

Melinda Mallard-Greene, Pretreatment Coordinator
USEPA REGION 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

Re: Louisville and Jefferson County Metropolitan Sewer District (MSD) Draft
Project XL Phase I Agreement

Dear Ms. Greene:

This letter is written in support of the proposed MSD Project XL (excellence in leadership) program. The proposed MSD Project XL program provides an opportunity to develop alternative strategies for sewer and watershed management that will allow more efficient allocation of resources (public and private) while contributing to improved watershed environmental quality.

The Draft Phase I Agreement between USEPA, MSD, and Kentucky Department for Environmental Protection represents a significant step toward achieving a Final Project Agreement for a proposed Project XL (excellence in leadership) program. The Draft Phase I Agreement provides a basis for a preliminary assessment of potential regulatory changes to allow flexibility in requirements for waste water treatment and/or stormwater discharge monitoring in a unified watershed - specifically, the Chenoweth Run/Floyds Fork (Jeffersonton) Watershed.

The Draft Phase I Agreement provides a basis for assessment of current pollutant loadings for the watershed and development of subsequent Performance Measures that may be implemented to allow Superior Environmental Performance (SEP) including more efficient allocation of resources on behalf of the private sector (industry, business, residential) and/or the public sector including MSD and environmental stakeholders. The collection of baseline pollutant loading data is intended to provide a basis for decision-making regarding more efficient utilization of resources to achieve superior environmental performance with regard to point and non-point sources of pollution including stormwater and sanitary sewer discharges to the watershed.

The Project XL program provides for three (3) phases including Phase 1:

Watershed Analysis, Source Identification, and Impact Analysis; Phase 2: Alternative Analysis and Program Redesign; and Phase 3: Implementation and Evaluation. The overall goal of the process is to allow MSD to more specifically identify and/or target watershed source loadings of pollution and then develop more efficient strategies to reduce identified source loadings while contributing to improved watershed environmental quality.

The Draft Phase 1 Agreement provides a basis for the collection and assessment of watershed quality data that is intended to provide for "holistic watershed management" leading to superior environmental performance including (1) improved monitoring and pollutant source identification; (2) a pollution prevention outreach program including education and technical assistance; and (3) reinvestment of cost-savings in watershed improvements. The Draft Phase 1 Agreement provides a basis for moving forward with a unified watershed management program that promotes efficient use of resources that will ultimately lead to improvements in watershed environmental quality.

The approach identified by MSD will provide a basis for more-efficient allocation of resources leading to the stated goals of superior environmental performance.

Preservation of stakeholder interests is recognized as a key element in the Draft Phase 1 Agreement as stated in Section VII, Part, pages 9 and 10. Stakeholder participation is considered essential to the decision-making process leading to adoption of a unified and cost-effective watershed management program that provides for significant improvements in stream water quality and habitat.

I support the Phase I Agreement and look forward to the opportunity to continue to participate in the stakeholder process.

Respectfully,

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