



Kevin L. Shafer, P.E.  
Executive Director

October 31, 2017

Lawrence Starfield, Principal Deputy Assistant Administrator  
Office of Enforcement and Compliance Assurance, 2201A  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dennis Lee Forsgren, Deputy Assistant Administrator  
Office of Water, 4101M  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Daft EPA Region 5 Administrative Order – MMSD Concerns and Meeting Request**

Dear Mr. Starfield and Mr. Forsgren:

The Milwaukee Metropolitan Sewerage District (MMSD) has operated one of our nation's most successful water reclamation and resource recovery programs for the past 90 years – producing Milorganite® fertilizer since 1926. EPA Region 5 has introduced new and previously unannounced interpretations of monitoring, reporting and temperature measurement requirements and is seeking to enforce these new requirements through an Administrative Order (AO). MMSD believes that the best remedy for the concerns raised by EPA Region 5 is through incorporation of clarifying language in the pending discharge permit, which is slated for reissuance in early 2018. Please find attached a “Summary of MMSD’s Position Regarding the Milorganite Matter.”

I respectfully request a meeting with you to discuss the detrimental and unnecessary impacts of the AO currently being advanced by EPA Region 5. This is a time sensitive matter, and I would hope to meet with you in Washington, DC, on one of the following dates: Tuesday, November 14; Wednesday, November 15, or Thursday, November 16. (Thursday, November 16 is a preferred option for MMSD.) Your thoughtful consideration of this matter and meeting request are greatly appreciated.

Sincerely,

Kevin L. Shafer, P.E.  
Executive Director



milwaukee metropolitan sewerage district  
260 W. Seeboth Street, Milwaukee, WI 53204-1446  
414-225-2088 • email: KShafer@mmsd.com • www.mmsd.com