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MEMORANDUM

October 3, 1983

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I. E. Janek

TO: Environmental Matters Committee & Consultants
Water Quality Control Subcommittee & Consultants
Nonferrous Smelter Subcommittee & Consultants
Ad Hoc Nonferrous Effluent Guidelines Work Group

FROM: Douglas E. McAllister, Assistant Chief Counsel

RE: AMC Supplemental Comments on Proposed EPA
Effluent Limitation Guidelines for Smelters and
Refineries

Enclosed are supplemental comments that AMC filed with EPA today on the proposed Effluent Limitation Guidelines, Pre-treatment Standards, and New Source Performance Standards for the Nonferrous Metals Manufacturing Point Source Category (48 Fed. Reg. 7032, February 17, 1983).

These supplemental comments consist of a detailed analysis of the economic impact of the proposed regulations on the primary copper, lead and zinc smelting industries. The analysis amplifies and supersedes Section V of AMC's comments submitted to EPA on May 27, 1983.

According to court order, the final regulations should be published in January 1984.

Enclosure