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March 22, 2011

Hon. Lisa P. Jackson
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460

Nancy K. Stoner
Acting Assistant Administrator
Office of Water

Re: Partnerships to Address Nitrogen Pollution through Use of Framework for State Nutrient Reductions

The Methanol Institute supports the Administrator's commitment to reducing nitrogen loading into the nation's waters through collaboration with states and other stakeholders. The Methanol Institute serves as the trade association for the global methanol industry and has a particular interest in encouraging denitrification techniques in waste water treatment facilities across the United States. Methanol, which serves as a catalyst to accelerate the biodegradation of nitrogen, has long been a safe, effective, and economical resource in achieving significant improvements in the quality of our most sensitive watersheds.

There are currently more than 200 wastewater treatment plants around the United States using methanol in the denitrification process. Most notably, the Blue Plains Wastewater Treatment Facility serving the Washington D.C. metropolitan area has continually met the EPA standard of 4.7 million pounds of nitrogen released per year, and has come in well below the standard on many occasions. Blue Plains has an average daily capacity of 370 million gallons, much of which is released in the Potomac River. In 2004, the Blue Plains facility first successfully reduced its nitrogen discharge by 38% by injecting methanol into its treatment process. The District of Columbia Water and Sewer Authority estimates the methanol denitrification process saved the facility about \$150 million compared with the capital and long-term costs of the closest alternative technology.

As the Methanol Institute works to encourage wastewater treatment facilities to adopt denitrification, we remain diligent in promoting the safe handling of methanol in the process. Over the years, the Methanol Institute has partnered with the Water Environment Federation to encourage safe handling practices at facilities around the country. MI and its members have also addressed regional and national WEF conferences and webinars. In addition, MI has held training sessions for wastewater treatment facility operators at the Blue Plains plant, and facilities in Arlington, Alexandria, Fairfax, Prince William and Loudon Counties. Once these facilities operators understand the risks of working with methanol and how to mitigate those risks, methanol can be used as a safe, efficient and cost-effective tool for biological nutrient removal.

For the Methanol Institute, methanol product stewardship is our primary objective and we believe denitrification methods are the next generation of tools needed to restore water quality nationwide. The Methanol Institute stands behind the Environmental Protection Agency and your continuing efforts to help states achieve near-term reductions in nutrient loadings. Please feel free to call upon us if we can be of any direct assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Dolan', is written over a light blue horizontal line.

Gregory Dolan
Executive Director
Americas/Europe