



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 1 1993

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Implementation of Metals Criteria

FROM: Martha G. Prothro *Martha G. Prothro*
Acting Assistant Administrator for Water

TO: Water Management Division Directors
Regions I-X

Since the issuance of the May 1992, Interim Metals Guidance ("Interim Metals Guidance"), we have continued to work on the issue of implementation of metals criteria for the protection of aquatic life. We have also sought the opinion of those outside EPA. On January 25-27, 1993, EPA held an open meeting in Annapolis, Maryland, to discuss metals. The purpose of this memorandum is to provide an overall description of our activities, and to place the Annapolis meeting in context. I encourage you to share it with your State and Tribal Water Quality Managers. A subsequent memorandum will provide our best technical recommendations as shaped by all information gathered since the Interim Metals Guidance. This memorandum will be submitted to you in draft for comment by the end of March, and we intend to issue it in final by April 15.

There were 34 participants at the Annapolis meeting, drawn from academics, consultants, the regulated community, States, EPA laboratories, EPA Regions, and EPA Headquarters. Approximately 120 observers attended, and offered comments. After this meeting, the participants met on January 28-29, in closed session to discuss short and long-term recommendations for EPA. They have prepared a document listing their short-term recommendations ("recommendations", attached).

The results of the meeting and the recommendations were positions of the participants, and the recommendations were not subject to formal EPA review. They are not EPA policy, but we will consider them carefully in preparing our guidance.

Metals Strategy - The strategy will address these issues and integrate others, such as metals in sediments and sludge.

Our long-term goal is to understand fully the toxicity and chemistry, and to develop appropriate methodologies based on that understanding. We are conducting research in these areas. In the near term, we will provide the above listed guidance documents on how to utilize the best present science while the science continues to evolve. Regions, States, and Tribes should continue all aspects of their water quality programs, including regulation of metals, while the additional guidance discussed above is being prepared. We believe this guidance will be consistent with the concepts expressed in the National Toxics Rule and have no plans to amend the rule.

If you have any questions concerning this memorandum, please telephone me or have your staff telephone Bob April (202-260-6322). We will also be soliciting public comments on the recommendations. You may send your comments on the recommendations to Margarete Heber, Mail Code WH-586, USEPA, Washington, DC 20460, and should inform any interested parties that such comments should be submitted to her.

Attachment