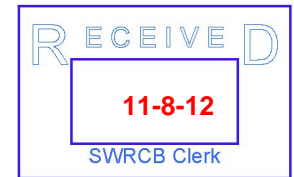




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105



November 8, 2012

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

Re: Draft Order in the matter of Waste Discharge Requirements Order No. R5-2010-0114 (NPDES No. CA0077682) for Sacramento Regional Wastewater Treatment Plant [Comments to A-2144 – December 4 Board Meeting]

Dear Ms. Townsend:

Thank you for the opportunity to review and comment on the draft Water Quality Order regarding waste discharge requirements Order No. R5-2010-0114 (NPDES permit No. CA0077682) for the discharge from the Sacramento Regional Wastewater Treatment Plant to the Sacramento River. We urge the Board to adopt this Order for several reasons. EPA strongly supports the State Board's proposed decision to uphold the Regional Board's permit requirements for pathogens and nitrate, and to correct the calculation of the ammonia effluent limitations. We agree with the State and Regional Boards that the permit must require the discharger to provide tertiary filtration to protect the MUN and REC beneficial uses. We also agree that the permit should not allow a mixing zone for ammonia to prevent further degradation to the Delta. It is important that the permit requires nitrification/denitrification to meet the State's antidegradation policy. Finally, we agree with the State and Regional Boards that in addition to protecting human health, the permit must address nutrient concerns for aquatic life. To help address nutrient discharge effects, we support the proposed approach to include the primary MCL for nitrate as an effluent limit in the absence of numeric aquatic life objectives for nitrate.

We commend the State Board and Regional Board for making substantial progress on these issues through this permitting action. If you would like to discuss these comments, please contact David Smith at (415) 972-2464 or Elizabeth Sablad of my staff at (415) 972-3044.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Woo".

Nancy Woo, Acting Director
Water Division