



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

June 16, 2015

Pamela Creedon, P.E.
Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Ste. 200
Rancho Cordova, CA 95670

Re: Draft Permit Amendment for Sacramento Regional Wastewater Treatment Plant (NPDES Permit No. CA0077682)

Dear Ms. Creedon:

Thank you for the opportunity to comment on the Central Valley Regional Board's proposed Order amending the NPDES permit for Sacramento Regional Wastewater Treatment Plant, dated May 20, 2015. We recognize the proposed permit amendments are related to recent court order and therefore must be accomplished by July 2015. We have reviewed the proposed amendments and have concerns about the selected hardness value for determining effluent limits for copper.

We support that the tentative order establishes water quality criteria and effluent limits based on hardness of receiving water (ambient hardness); this is consistent guidelines within the California Toxics Rule and State Implementation Plan. The factsheet provides the range of hardness monitoring data as well as Board staff approach for determining the selected hardness value. Specifically this iterative approach is described to result in ambient criteria that are protective of all beneficial uses as well as within "reasonable worst-case ambient conditions." Table F-7 provides the selected receiving water hardness value (84 mg/L) used to compute the effluent limitations for copper. However, the selected hardness value for copper is outside the ambient hardness values in downstream waters (34 to 76 mg/L), so the corresponding effluent limits based on this elevated selected hardness value do not seem to provide adequate protection of downstream beneficial uses. EPA requests the Board provide further clarification regarding how its iterative approach for selecting hardness value and corresponding metal effluent limitations are sufficiently protective to meet CTR criteria in downstream waters, including water quality criteria are not exceeded more than once in a three year period on average.

We also note the facility's performance-based average monthly value for copper (8.1 ug/L) is above the proposed average monthly effluent limit (7.4 ug/L); thus, it appears the permit should include a compliance schedule for copper effluent limits.

We appreciate Regional Board staff effort to modify the amending Order; we also recognize this permit will receive a comprehensive review and renewal in early 2016. If you have questions, please contact me at (415) 972-3520 or Peter Kozelka of my staff at (415) 972-3448.

Sincerely,

A handwritten signature in black ink, appearing to read "James Marincola", written in a cursive style.

James Marincola
Acting Manager,
NPDES Permits Office (WTR 2-3)