



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

October 15, 2012

Jenny Newman
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Ms. Newman,

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to comment on the proposed revised Los Angeles River Nitrogen Compounds and Related Effects TMDL. EPA supports the revision of these TMDLs, based on the technical approach and the implementation plan to reduce nitrogen compound loading into the Los Angeles River watershed.

The proposed TMDL includes revisions based on site-specific objectives for ammonia within select waterbodies of the Los Angeles River. In 2007, The Regional Board amended the Water Quality Control Plan to incorporate these site-specific objectives and the State Board approved in 2008. EPA reviewed and approved the site-specific ammonia amendments in 2009. See letter from Alexis Strauss to Dorothy Rice, dated March 30, 2009. The revised TMDL contains the appropriate site-specific amendments for both acute and chronic numeric criteria to address aquatic life protection. More specifically, we note the proposed Resolution includes the following paragraph regarding major and minor point sources in the watershed:

Regardless of the SSO and SSO-derived WLAs, for dischargers with concentrations below site-specific water quality objectives, effluent limitations shall ensure that effluent concentrations do not exceed the level of water quality that can be reliably maintained by the facility's applicable treatment technologies existing at the time of permit issuance, reissuance or modification...Permit compliance with anti-degradation and anti-backsliding requirements shall be [analyzed and] documented in permit factsheets. (pp 7-9)

EPA strongly supports this language to be included in the final TMDL report and the final Basin Plan Amendment, since it provides clarification on how wasteload allocations will be implemented via NPDES permits.

We urge the Regional Board to adopt the TMDL at the next Board meeting to meet California's TMDL commitments to EPA. If you have any questions, please contact me at (415) 972-3448, or Cindy Lin, TMDL Coordinator, at (213) 244-1803.

Sincerely yours,

A handwritten signature in black ink, appearing to read "PKozelka", written over a horizontal line.

Peter Kozelka
NPDES Permits Office, Water Division