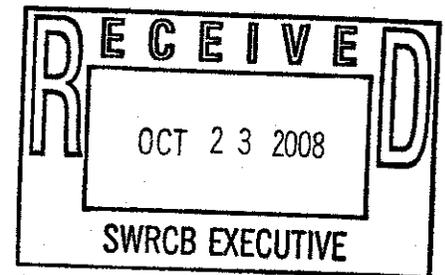


Public Comment
WQO - Cadmium
Deadline: 10/23/08 by 12 noon

From: <Fleck.Diane@epamail.epa.gov>
To: <commentletters@waterboards.ca.gov>
CC: <scamacho@waterboards.ca.gov>, <rasmussen@waterboards.ca.gov>, <Hashimo...>
Date: Thursday, October 23, 2008 8:29 AM
Subject: Comment Letter - Water Quality Objectives for Cadmium and Related Implementation Methods

Dear Ms. Townsend,

The U.S. Environmental Protection Agency (EPA) would like to thank State Board staff for their hard work and for the opportunity to comment on the "Scoping Document for the Proposed Amendment to the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California to Establish Water Quality Objectives for Cadmium and Related Implementation Methods." This document was publicly noticed on July 18, 2008. We reviewed the three proposed alternatives and support the Staff Recommended Alternative, Alternative 3. Alternative 3, "Adoption of freshwater criteria equations without a specified hardness value and adoption of revised saltwater criteria," is consistent with EPA's most recent Clean Water Act section 304(a) guidance criteria for cadmium in EPA's "2001 Update of Ambient Water Quality Criteria for Cadmium," EPA-822-R-01-001, dated April 2001. The proposed objectives are also protective of Federally listed threatened and endangered species, as discussed in the U.S. Fish and Wildlife Service's and the National Marine Fisheries Service's Joint Biological Opinion for the California Toxics Rule, dated March 24, 2000.



In the description of Alternative 3, it states that since only the hardness-based equations for the freshwater criteria would be adopted, the alternative would require hardness data to determine applicable criteria. Although this alternative involves more effort than Alternative 2 which proposes to adopt criteria based on default hardness values, Alternative 3 would result in more appropriate freshwater aquatic life criterion values for individual water bodies. We support this approach. We also support the inclusion of appropriate default hardness values in Alternative 3, in instances where no specific water body data are available.

We appreciate your work on this project and we thank you for the opportunity to comment. If you have any questions, please do not hesitate to call me at the number below.

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