



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

Matt Scroggins
California Regional Water Quality Control Board
Central Valley Region
Fresno Branch Office
1685 E Street
Fresno, CA 93706

May 15, 2007

Dear Mr. Scroggins:

Thank you for the opportunity to comment on the limitations and monitoring for ammonia for the City of Atwater Wastewater Treatment Facility permit (NPDES number CA0079197). We support the seasonal fixed ammonia limitations as currently written, and urge the Board to adopt this permit at the June meeting, subject to our comment on the compliance schedule, below.

EPA prefers the use of fixed numeric limits to floating limits, and supports the ammonia limits proposed in the draft permit. Because floating limits can be problematic when tracking compliance, EPA supports the use of fixed limits. (Please see the preamble to EPA's 1999 Update of Ambient Water Quality Criteria for Ammonia for a detailed description of EPA's recommended ammonia limit calculations. This document can be found at www.epa.gov/waterscience/criteria/ammonia/ammonia.pdf.)

EPA's only concern with the proposed ammonia limitations relates to the associated compliance schedule. The basis for granting this compliance schedule with a December 7, 2011 deadline is not discussed in the record for the permit. We suggest that you work with the State Water Resources Control Board staff to ensure that the compliance schedule proposed is appropriate and provide a discussion in the fact sheet explaining the basis for this compliance schedule.

Thank you for your consideration of these comments. If you have any questions, please contact Sara Greiner at (415) 972-3042, or Nancy Yoshikawa at (415) 972-3535.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas E. Eberhardt".

Douglas E. Eberhardt, Chief
CWA Standards and Permits Office