



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

June 30, 2014

James Marshall
Senior Water Resources Control Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Re: Draft Tentative Orders amending NPDES Permit for the Sacramento Regional Wastewater Treatment Plant (NPDES Permit No. CA0077682)

Dear Mr. Marshall:

Thank you for the opportunity to review and comment on two proposed Orders amending the NPDES permit for Sacramento Regional Wastewater Treatment Plant discharges to Sacramento River at Freeport, dated May 27, 2014. EPA has reviewed the tentative permit amendments and we offer our support for the proposed amendments to effluent limits for ammonia and pathogens.

For ammonia, we acknowledge the modified interim limits will result in slight increases in discharge concentrations but no change in discharge mass amounts. We appreciate receiving the additional modeling information from the discharger describing that there will be very minimal changes in ammonia levels within the receiving waters. We note the final ammonia limits have not been changed from the 2010 permit and are based on EPA's 1999 criteria.

For pathogens, we recognize the proposed modification provides final seasonal effluent limits that meet water quality standards in the receiving waters during dry and wet weather conditions. More specifically, this Order removes the requirement to provide California Department of Health Services, Title 22 disinfection (or equivalent) to discharges occurring during November–April, however, the modification changes only the duration of the effluent limit (from 7-day median to monthly median). We also note these final limits are based on State standards (Title 22), which are more protective than federal water quality criteria, and the proposed amendment is consistent with a recent settlement agreement between the discharger and the State.

Finally, we are aware the discharger has entered into Endangered Species Act Section 7 consultation with the responsible federal agencies regarding the construction upgrades to the facility; we want to inform you that EPA will be the lead federal agency on this matter.

We appreciate efforts by your staff to modify the amending Order; we are pleased to offer support for the permit modifications. If you have questions, please contact me at (415) 972-3464 or Peter Kozelka at (415) 972-3448.

Sincerely,

A handwritten signature in black ink, appearing to read "David Smith". The signature is written in a cursive style with a horizontal line at the end.

David Smith, Manager
NPDES Permits Office (WTR-5)