



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

James Marshall  
California Regional Water Quality Control Board  
Central Valley Region  
Sacramento Main Office  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670

January 5, 2009

Dear Mr. Marshall:

Thank you for the opportunity to comment on the draft NPDES permit for the City of Sacramento Combined Wastewater Collection and Treatment System (NPDES number CA0079111). EPA's comments pertain to monitoring of the discharges, prevention of untreated combined sewer system discharges, and overflow reporting requirements.

EPA strongly supports careful characterization of the discharges through NPDES permit monitoring requirements. The proposed total mercury and methylmercury monitoring is crucial for implementation of the pending TMDL for methylmercury in the Delta, and we urge the Board to retain the requirement. Additionally, given concerns regarding ammonia toxicity, we strongly recommend ammonia and acute WET monitoring be added to table E-3 (effluent from the wet weather facilities), table E-4 (untreated combined wastewater from the other outfalls) and table E-5, (receiving water monitoring). Additionally, we recommend fecal coliform monitoring for the receiving water be added to table E-5, and that a priority pollutant scan with at least a yearly frequency be added to tables E-3 and E-4.

For discharges of untreated wastewater, we recommend adding a permit provision requiring the discharger to determine the cause of the overflow and whether each of the untreated discharges could have been avoided with operational measures or infrastructure improvements. It appears from Tables F-5 and F-6 that the only reported untreated discharge over the past five years was an 11.25 million gallon discharge that occurred on January 4, 2008. It is unclear if there were other smaller untreated discharges that were not reported, as table F-6 reports "total flow treated" but does not explain whether or how much flow through the outfall was untreated. The tables should be revised to report smaller untreated discharges, if any. Although large untreated discharges appear to be infrequent, 11.25 million gallons is not a trivial volume. The allowable discharge under the permit is 380 MGD, with a requirement that 85 percent of this flow be treated on an annual average basis. This means that theoretically, the permit could allow 57 MGD of untreated combined wastewater to flow to the Sacramento River. While we understand that the permit contains operational requirements, determining compliance with these operational requirements is often a challenge. Therefore we believe that, at a minimum, a closer look at the cause of these untreated discharges is warranted.

EPA supports provision 4.b.ix.(c) regarding the street flooding provisions in the CSO long-term control plan. However, we recommend adding a timeframe for compliance with the specified goals. Requiring a report regarding the progress toward meeting these goals is a positive step, but we would like to see an associated deadline included in the permit.

EPA strongly supports the combined sewer system outflow reporting requirements contained in attachment G. We believe the general WDR for sanitary sewer overflows applies to the combined sewer systems, and we would like to see all the provisions of the general WDR applied to this permit.

Thank you for your consideration of these comments. If you have any questions, please contact me at (415) 972-3464, or Nancy Yoshikawa at (415) 972-3535.

Sincerely,

A handwritten signature in black ink, appearing to read "David Smith". The signature is fluid and cursive, with the first name "David" and the last name "Smith" clearly distinguishable.

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