



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

May 20, 2013

Danny McClure, P.E.
Senior Water Resources Control Engineer, Pesticide TMDL Unit
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. McClure,

Thank you for the opportunity to review and comment on the draft amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (the "Basin Plan") for the Control of Diazinon and Chlorpyrifos report dated March, 2013. We reviewed the proposed actions in the report and conclude they are consistent with applicable federal regulations concerning TMDL development. Our comments are as follows.

We support the specific diazinon and chlorpyrifos pesticide objectives that they are consistent with your previously adopted and approved diazinon and chlorpyrifos TMDLs. We support that the joint toxicity of these chemicals be expressed as a measurement of additive toxicity in the calculation of the loading capacity. We support the calculation of toxic equivalents calculation according to your Board's Basin Plan's method for considering additive toxicity as this approach applies to both acute and chronic endpoints. In addition, this approach is easily applicable to additional chemicals besides the two pesticides currently being addressed in this action. We also support the increased specificity regarding the application of the wasteload allocations to NPDES discharges. The language provides a reasonable mechanism for implementation of the wasteload allocations for wastewater dischargers.

Lastly, we recognize that this amendment has been under development for the past several years and believe that this amendment needs to be considered by your Board for adoption, hopefully this summer. We appreciate your hard work and efforts on this TMDL. Any questions or further discussions, please call me at 916-341-5520 or denton.debra@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra L. Denton".

Debra L Denton, PhD
Environmental Scientist