

**NATURAL RESOURCES DEFENSE COUNCIL  
NATIONAL ASSOCIATION OF CLEAN WATER AGENCIES**

January 23, 2006

Mr. Benjamin Grumbles  
Assistant Administrator for Water  
U.S. Environmental Protection Agency (EPA)  
Ariel Rios Building (4101M)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ben,

The Natural Resources Defense Council (NRDC) and the National Association of Clean Water Agencies (NACWA) express our sincere appreciation to EPA for proposing for public comment a policy addressing peak wet weather flow blending at wastewater treatment plants serving separate sanitary sewer systems that is based upon our recommendations (70 Fed. Reg. 76,013 (Dec. 22, 2005)). NRDC and NACWA support moving forward with EPA's policy proposal because it will enhance protections for public health and the environment by promoting significant improvement in the management and treatment of peak wet weather flows. We agree with the proposed policy's introductory statement:

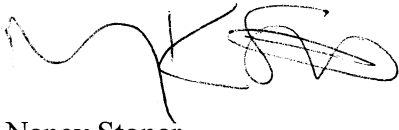
*"EPA expects that aggressive efforts by sewage treatment plants in consultation with permitting authorities can lead to dramatic reductions in the volume and duration of peak wet weather flows and can improve the treatment and quality of peak wet weather flow discharges."*

We recognize that EPA will receive comments on the proposed policy from several perspectives. We believe that as EPA moves forward to finalize its proposed policy, it is very important that these comments and issues be addressed, as they come from entities upon whom the success of any final policy ultimately depends. NRDC and NACWA support EPA responding to these comments in a manner that provides clarification in line with the spirit and objectives of the proposed policy. We support EPA's development of materials that will support a final policy, such as a "frequently asked questions" document, technical guidance, decisionmaking flow charts, and similar items to ensure effective and consistent implementation of a final policy. It is essential that such clarifications and materials are carefully made and developed so that they do not change or disrupt the proposal's framework and intent, which we believe is fundamentally sound.

Our organizations appreciate the opportunity to work with you on this important environmental and public health issue and look forward to reaching the finish line on this matter together in the near future.

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Sincerely yours,



Nancy Stoner  
Director, Clean Water Project  
Natural Resources Defense Council



Alexandra Dapolito Dunn  
General Counsel  
National Association of Clean Water Agencies

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Mailcode 4101T  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460  
*owdocket@epa.gov*