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Ken Kirk

July 13, 2006

George Robin, Environmental Engineer
United States Environmental Protection Agency Region IX
Ground Water Office, WTR-9
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Robin:

The National Association of Clean Water Agencies (NACWA) is pleased to provide these brief comments in support of EPA Region 9's Underground Injection Control Program draft permit for Los Angeles County, California (CA5060001).

NACWA is a non-profit trade association that represents the interests of nearly 300 publicly owned treatment works (POTWs). NACWA's POTWs are public servants dedicated to carrying out the water quality objectives of the Clean Water Act (CWA) and to seeking sound, effective and innovative solutions to improve water quality in America.

For more than 35 years under the Clean Water Act, POTWs have developed a unique expertise and knowledge regarding how to manage their biosolids safely and effectively. The Association, therefore, has long advocated that POTWs are best equipped to determine the most effective and sound management practices for their biosolids.

For the City of Los Angeles, a NACWA member, underground injection provides another sound biosolids management option in addition to the City's practice of beneficially reusing biosolids via land application.

NACWA not only believes that L.A. is in the best position to determine how to manage its biosolids, but also that EPA Region 9's rigorous literature and data review demonstrate the overall safety and effectiveness of the injection well technology. As the draft permit notes, the project would fully meet the Underground Injection Control requirements of Title 40 of the Code of Federal Regulations, §124.8.

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For these reasons, the Association offers its support to Region 9 in finalizing its draft permit. Thank you for your attention to this matter. Please contact me at 202/833-2672 with any further questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "K Kirk". The signature is written in a cursive style with a vertical line to the right of the name.

Ken Kirk
Executive Director