

EXECUTIVE COMMITTEE
PRESIDENT

Suzanne E. Goss

Government Relations Specialist
JEA (Electric, Water & Sewer)
Jacksonville, FL

VICE PRESIDENT

Julius Ciaccia, Jr.

Executive Director
Northeast Ohio Regional
Sewer District
Cleveland, OH

TREASURER

Karen L. Pallansch

Chief Executive Officer
Alexandria Renew Enterprises
Alexandria, VA

SECRETARY

Adel H. Hagekhalil

Assistant Director
Bureau of Sanitation
City of Los Angeles
Los Angeles, CA

PAST PRESIDENT

David R. Williams

Director of Wastewater
East Bay Municipal
Utility District
Oakland, CA

EXECUTIVE DIRECTOR

Ken Kirk

December 20, 2012

Water Docket

Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Submitted via www.regulations.gov

Re: Docket ID No. EPA-HQ-OW-2009-0596

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the *Water Quality Standards for the State of Florida's Lakes and Flowing Waters; Proposed Rule; Stay* (Inland Waters Rule Stay). NACWA's public clean water agency members treat and reclaim a majority of the wastewater generated each day nationwide. NACWA's 11 members within the State of Florida will be directly affected by the U.S. Environmental Protection Agency's (EPA's) water quality standards if they are allowed to go into effect. NACWA members recognize the contribution of discharges from POTWs to the existing water quality challenges in Florida and are committed to improving the overall water quality of the State's waterbodies.

NACWA supports EPA's proposed stay of the inland waters rule until November 2013, which will allow sufficient time for the Agency to clarify how the Florida Department of Environmental Protection (FDEP) will implement their EPA-approved water quality standards (hereafter referred to as state rules). Every effort should be made to use the state rules to address water quality concerns in Florida; the stay will give the state more time to take the steps necessary to eliminate the need for the EPA rules.

A recent administrative challenge raised uncertainty about FDEP's ability to implement its state rules consistent with their EPA-approved implementation plan. In addition, the state rules contain a stipulation that if any provision of the rules is deemed invalid by any administrative or judicial proceeding, or EPA, then the entirety of the rules cannot be implemented. It is important that the Agency have enough time to consider the implications of both of these matters and ensure the state rules go into effect as planned.

NACWA Letter of Support for the Iowa Nutrient Reduction Strategy
December 20, 2012

Thank you for consideration of NACWA's comments on the inland waters rule stay. Please contact me at 202/833-9106 or chornback@nacwa.org if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hornback". The signature is fluid and cursive, with the first name "Chris" being more prominent than the last name "Hornback".

Chris Hornback
Senior Director, Regulatory Affairs