



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901**

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RETURN RECEIPT REQUESTED

February 10, 2009

In Reply Refer To: CWA-309(a)-09-009

Mr. David Gromm
Director of Wastewater
City of Pacifica
Calera Creek Water Recycling Plant
170 Santa Maria Avenue
Pacifica, CA 94044

Dear Mr. Gromm:

The enclosed Findings of Violation and Order for Compliance, issued pursuant to the Clean Water Act, addresses the City of Pacifica's violations of federal biosolids standards at the Calera Creek Water Recycling Plant in 2007. EPA's Standards for the Use or Disposal of Sewage Sludge (40 CFR 503) include standards to regulate the quality of sewage sludge used for land application. Based on a review of Pacifica's 2007 annual biosolids report, EPA has determined that Pacifica violated 40 CFR 503 when it sent its biosolids for land application during the first two quarters of 2007.

The Order for Compliance ("Order") includes requirements for identifying a person responsible for and establishing a procedure for ensuring that biosolids are not land applied when pathogen and/or vector attraction reduction requirements are not met. In addition, the Order requires Pacifica to report results of self-monitoring on a monthly basis to EPA for a period of one year.

The required reports of self-monitoring were originally based on the assumption that Pacifica would continue to be producing Class B biosolids. We just heard from you that Pacifica is planning to produce Class A biosolids. Accordingly, we have added flexibility to the self-monitoring and reporting requirements of the Order to account for the upcoming change.

If you have any questions regarding this matter, please call me at (415) 972-3572, or contact Anna Yen at (415) 972-3976 (or yen.anna@epa.gov).

Sincerely,
<Original
signed by>
Alexis Strauss
Director, Water Division

Enclosure

cc: John Madigan, RWQCB2 – San Francisco Bay
Claudia Villacorta, RWQCB2 – San Francisco Bay
Robin Merod, RWQCB5 – Central Valley, Sacramento Office
Doug Patteson, RWQCB5 – Central Valley, Fresno Office
Al Hunt, Synagro
Jeffrey Bell, County of Solano, Environmental Health Division
David Block, Merced County, Division of Environmental Health