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July 24, 2015

Water Docket

U.S. Environmental Protection Agency

1200 Pennsylvania Ave. NW

Washington, DC 20460

Via email: OW-Docket@epa.gov

Re: Docket No. EPA-HQ-OW-2014, Effluent Limitations Guidelines and Standards for the Oil and Gas Extraction Point Source Category

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the proposed rule, *Effluent Limitations Guidelines and Standards for the Oil and Gas Extraction Point Source Category* (80 FR 18557, April 7, 2015). NACWA represents the interests of nearly 300 public clean water agencies nationwide. NACWA members operate highly successful pretreatment programs that significantly reduce the amount of pollutants discharged into the sewer system, preventing these pollutants from passing through or interfering with the wastewater treatment process.

We are not aware of any NACWA members currently managing wastewater from unconventional oil and gas (UOG) extraction facilities, and we did not receive any concerns about the proposed prohibition in response to our requests for input from NACWA members. For these reasons, NACWA supports the proposed prohibition of indirect discharges to publicly owned treatment works (POTWs). In addition, the prohibition currently makes sense due to the ongoing research into the environmental impacts of the chemicals used in the extraction process and the prohibition of direct discharges. However, NACWA believes that EPA should periodically review this rule as environmental impacts of various chemicals are finalized and evaluate potential pretreatment technologies for UOG extraction wastewater. In the future, concerns that such discharges can disrupt POTW treatment processes may be eliminated or minimized or it may be technologically practical for POTWs to accept discharges from oil and gas extraction facilities, subject either to national pretreatment standards or local limits.

NACWA recommends that EPA clarify the role of centralized waste treatment (CWT) facilities that discharge to POTWs. These CWT facilities should only accept UOG wastewater if approved to do so by the local municipality.

NACWA Comments on UOG ELG

July 24, 2015

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Thank you for your consideration of these comments. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cynthia A. Finley". The signature is written in a cursive style with a large, stylized initial 'C'.

Cynthia Finley
Director, Regulatory Affairs