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September 8, 2010

Air and Radiation Docket and Information Center

Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Via email: a-and-r-docket@epa.gov

Re: Docket ID No. EPA-HQ-OAR-2010-0295

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the proposed revisions to the standards of performance for new stationary compression ignition and spark ignition internal combustion engines (ICE). NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the U.S. The proposed new source performance standards (NSPS) for ICE could affect NACWA members because various aspects of the wastewater treatment process require that they purchase, own, and operate engines that are fired on various fuels.

NACWA generally supports the revisions to the NSPS. Specifically, NACWA supports the proposed emissions standards for nitrogen oxides (NO_x) that eliminate the need for emission reduction aftertreatment technologies for emergency engines with displacement at or above 30 liters/cylinder (l/cyl). NACWA also supports keeping the compliance requirements geared towards the manufacturers of the engines, rather than the owners and operators. However, the requirement that owners and operators follow the manufacturers' operation and maintenance procedures related to emissions may be difficult for owners and operators to implement. These procedures are not written as permit enforceable documents, and many unintentional violations may occur which do not result in any real increase in emissions. While the proposed revisions allow more flexibility for owners and operators to use alternative procedures, use of the alternative requires performance testing on engines greater than 100 HP to demonstrate compliance with the emissions standards. This performance testing will be expensive and will likely be too burdensome for wastewater utilities, thereby eliminating the option to follow the alternative procedures. The simpler requirement to keep a maintenance plan and records that is proposed for engines below 100 HP should also be the requirement for larger engines.

In addition, NACWA is concerned that the emissions standards may still be difficult to meet for engines that use digester gas, and requests that digester-fired engines be exempt from the NSPS. The digester gas generated in the wastewater treatment process contains methane, a potent greenhouse gas, which can be beneficially used to power engines while simultaneously reducing a utility's reliance on other fuel sources and reducing greenhouse gas emissions. Utilities should be encouraged to use digester gas engines, rather than face a situation where it is more cost-effective to purchase power from an electric utility and to waste a valuable fuel source by flaring the digester gas.

Thank you for consideration of our comments on the proposed revisions to NSPS for ICE. Please contact me at 202/296-9836 or cfinley@nacwa.org if you have any questions about NACWA's comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Cynthia A. Finley". The signature is fluid and cursive, with the first name "Cynthia" being more prominent.

Cynthia A. Finley
Director, Regulatory Affairs