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July 15, 2011

Dr. Holly Stallworth

Designated Federal Officer

Science Advisory Board

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Via email: stallworth.holly@epa.gov

Re: Biogenic Carbon Emissions Panel Nominees

Dear Dr. Stallworth:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the "short list" of nominees for the EPA Science Advisory Board (SAB) panel on greenhouse gas (GHG) accounting methodology for biogenic carbon dioxide (CO₂) emissions from stationary sources, and to provide additional support for our nomination of Dr. Nancy Love of the University of Michigan. NACWA's public wastewater treatment agency members treat and reclaim a majority of the wastewater generated each day nationwide, providing an essential service that protects public health and the environment.

The majority of GHG emissions produced by publicly owned treatment works (POTWs) are biogenic. These biogenic CO₂ emissions result from the biological decomposition that occurs during wastewater treatment processes; the combustion of biogas that is produced from the anaerobic digestion of sludge; and the combustion of biosolids. EPA's final rule deferring biogenic CO₂ emissions from the Clean Air Act (CAA) Title V and Prevention of Significant Deterioration (PSD) permitting programs, signed on July 1, 2011, specifically lists these three POTW sources as emissions that are deferred. Whether or not this deferral is made permanent will have a significant impact on permitting requirements for POTWs.

Wastewater was not listed specifically as one of the expertise areas required for the expert panel in the request for nominations (76 Fed. Reg. 23587). Because of the significance of biogenic CO₂ emissions for POTWs, however, it is important that an expert on wastewater treatment emissions be placed on the SAB panel. NACWA nominated Dr. Love for the SAB panel, and the Association supports Dr. Love's appointment to the expert panel. Of the 82 nominees on the "short list," only Dr.

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Love is an expert on wastewater treatment processes and emissions, which is proven by her extensive research and publication record. In addition, Dr. Love serves on the SAB Drinking Water Subcommittee and understands the purpose and processes of the SAB. Through her involvement with the Drinking Water Subcommittee and her other professional activities, Dr. Love has demonstrated her impartiality and her ability to work constructively and effectively in committees.

Thank you for your consideration of our comments on the nomination of Dr. Love to the SAB expert panel on biogenic emissions. 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 cursive script, reading "Cynthia A. Finley".

Cynthia A. Finley
Director, Regulatory Affairs