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October 31, 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](mailto:stallworth.holly@epa.gov)

**Re: NACWA Comments at October 25-27 Meeting of the Biogenic Carbon Emissions Expert Panel**

Dear Dr. Stallworth:

The National Association of Clean Water Agencies (NACWA) appreciated the opportunity to provide comments on October 26 at the meeting of the EPA Science Advisory Board (SAB) panel on greenhouse gas (GHG) accounting methodology for biogenic carbon dioxide (CO<sub>2</sub>) emissions from stationary sources. A summary of my comments is provided below.

NACWA represents nearly 300 public wastewater treatment agencies that treat and reclaim a majority of the wastewater generated each day nationwide. These utilities perform an essential service that protects public health and the environment and must meet their permitted discharge requirements under the Clean Water Act. Biogenic CO<sub>2</sub> emissions are produced at wastewater treatment facilities through the wastewater treatment process and from combustion of the biogas and biosolids that are produced from wastewater treatment. These emissions must be considered part of the natural carbon cycle because of the inherently renewable nature of human waste, which is constantly produced and would result in carbon dioxide emissions whether it was treated at a utility or left to decompose naturally.

In the draft *Accounting Framework for Biogenic Emissions from Stationary Sources*, wastewater treatment is assigned a "biological accounting factor" (BAF) of zero, indicating that all of the CO<sub>2</sub> emissions are part of the natural carbon cycle. Because of the nature of human waste and the important public service provided by wastewater utilities, NACWA recommends that the SAB panel keep this BAF in place for wastewater treatment. The combustion of biogas and biosolids also allows utilities to generate heat and electricity for use in their operations, reducing

and sometimes eliminating their reliance on fossil fuels and power derived from fossil fuels. Overall GHG emissions are therefore reduced through the combustion of these products.

NACWA is currently collecting information from its members about the magnitude of their biogenic CO<sub>2</sub> emissions. This calculation has not yet been performed by many utilities since biogenic emissions are typically exempt from most GHG accounting systems and there is not a standard accepted method for calculating these emissions from wastewater treatment. The information that NACWA has collected so far indicates that if biogenic CO<sub>2</sub> calculations were not exempt, some wastewater utilities would already be regulated by the Title V and Prevention of Significant Deterioration (PSD) permitting programs of the Clean Air Act under the current tiered approach of the GHG Tailoring Rule.

Thank you for your consideration of our comments about biogenic emissions from wastewater treatment utilities. Please contact me at 202/296-9836 or [cfinley@nacwa.org](mailto:cfinley@nacwa.org) if you have any questions.

Sincerely,

Cynthia A. Finley, Ph.D.  
Director, Regulatory Affairs