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June 21, 2012

Robert Jones

Chemical Control Division

Office of Pollution Prevention and Toxics

U.S. Environmental Protection Agency

1200 Pennsylvania Ave, NW

Washington, DC 20460

Via Email: [jones.robert@epa.gov](mailto:jones.robert@epa.gov)

**Re: Interested Party in Enforceable Consent Agreement Development for Two  
Cyclic Siloxanes (77 Fed. Reg. 31008)**

Dear Mr. Jones:

The National Association of Clean Water Agencies (NACWA) requests to be considered an interested party in the enforceable consent agreement (ECA) negotiations to collect environmental monitoring data for octamethylcyclotetrasiloxane (D4) and decamethylcyclopentasiloxane (D5). 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 wide use of D4 and D5 in a variety of industrial, commercial, and consumer products results in the discharge of these compounds into the sewer system. During wastewater treatment, D4 and D5 in the wastewater and the biosolids are volatilized into the biogas that comes off the digesters. Biogas may be combusted to generate renewable power in gas turbines, boilers, or internal combustion engines. This combustion leads to the conversion of siloxanes into silicon dioxide that is deposited in the exhaust stages of the equipment, resulting in loss of heat transfer efficiency, premature equipment failure, and destruction of emissions control catalysts. The increased maintenance and necessary siloxane removal systems are very expensive to wastewater treatment utilities and, therefore, NACWA has direct interest in the collection of additional data on the impacts of siloxanes.

In addition, NACWA shares EPA's concerns about the persistence, bioaccumulation, and toxicity of D4 and D5 in the environment. NACWA is interested in obtaining more information about the fate and transport of these compounds that are introduced into the environment through the discharge of wastewater and the beneficial reuse of biosolids as a fertilizer or soil amendment.

NACWA Request, Interested Party in Enforceable Consent Decree

June 21, 2012

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Thank you for our request to become an interested party in this ECA negotiation. Please contact me at 202-533-1836 or [cfinley@nacwa.org](mailto:cfinley@nacwa.org) if you have any questions about NACWA's request.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia A. Finley". The ink is dark and the signature is fluid.

Cynthia A. Finley  
Director, Regulatory Affairs