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The National Association of Clean Water Agencies appreciates the opportunity to comment on the proposed electronic reporting and recordkeeping requirements for New Source Performance Standards (80 *Fed. Reg.* 15100; March 20, 2015). NACWA represents the interests of more than 280 publicly owned wastewater treatment utilities across the United States. Many of NACWA's members also operate sewage sludge incinerators (SSIs) that will be impacted by the proposed reporting and recordkeeping requirements.

NACWA has generally supported efforts to improve the storage and transmission of environmental reports and information where such efforts reduce the burden to its members. Unfortunately, electronic reporting and recordkeeping requirements often add to the administrative and cost burden faced by our members, especially where specific electronic reporting tools are required.

Below are a few concerns expressed by our members on the proposed reporting requirements.

- There is no standard used for collecting the required reporting data from wastewater treatment plant SCADA systems. In many cases, the data would have to be manually entered from internal reports into the required reporting system, introducing an additional likelihood for mistakes. Our members have spent extensive amounts of time programming and testing the requirements for data collection for their site-specific requirements. The cost involved in this programming, software updates, monitoring, instrumentation, data collection and review due to new and future regulations has not been considered in the summary of cost savings (Table 4).

- The requirements for some of the operating conditions for SSIs are site-specific, adding to the complexity of electronic reporting. These operating conditions will change each time a performance test is completed, thus adding additional complexity to the electronic reporting.
- Our members who have been trained on EPA's electronic reporting tool have found the system to be very complex. They have also been told that it does not work well with firewalls. Utility IT systems, like any other business computer system, must ensure protection from computer hackers and viruses. Given the additional vulnerability of wastewater systems as potential targets for cyber-attacks and attempts to take over the utility's controls systems, it is essential that any communication with an outside reporting tool provide for a secure connection. Establishing workarounds to enable secure use of the reporting tool will add to the burden associated with these new requirements. EPA should ensure that its reporting tool can be safely and efficiently used by the regulated community.
- Concerns with Table 4 – Summary of Cost Savings
 - The number of performance tests and periodic reports in year 3 through 20 have decreased. The assumption that these numbers will decrease even with the likelihood of increased regulation seems flawed.
 - The assumption that labor rates remain flat for 20 years does not accurately account for the increase in labor costs over such a long period of time.
 - The hours and costs involved for reporting are decreasing, which NACWA assumes is intended to reflect a decreased burden and potential savings in hours over the long-term due to electronic reporting. NACWA does not believe that this accurately reflects the amount of time that will be required to 'translate' utility-specific information into a format that can be transmitted via the reporting tool.

NACWA appreciates the opportunity to comment on the proposed rule. While this rule would only apply to the handful of new source SSIs currently in operation, we understand that EPA intends to expand these requirements to apply to all SSIs at some point in the future. This will greatly expand the number of public wastewater treatment utilities required to comply with these electronic reporting requirements.

Sincerely,



Chris Hornback
Senior Director, Regulatory Affairs