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February 9, 2017

Karen Marsh

Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711
Submitted via www.regulations.gov

RE: Comment Extension Request, *National Emission Standards for Hazardous Air Pollutants: Publicly Owned Treatment Works*, Docket ID EPA-HQ-OAR-2016-0490

Dear Ms. Marsh:

The National Association of Clean Water Agencies (NACWA) respectfully requests a 120-day extension of the comment period for the proposed rule, *National Emission Standards for Hazardous Air Pollutants: Publicly Owned Treatment Works* (POTW NESHAP), published on December 27, 2016 (81 *Fed. Reg.* 95352). NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies, serving the majority of the sewered population in the U.S. The six facilities identified by EPA as subject to the POTW NESHAP belong to NACWA member utilities, and additional NACWA members may also be subject to the rule.

NACWA needs more time to work with its members to determine whether key definitional changes or adjustments to EPA's methodology for estimating hazardous air pollutant (HAP) emissions will result in their reaching the major source threshold. The proposed NESHAP includes HAP emissions from the collection system in this major source determination, and many POTWs did not include collection system emissions in their previous modeling. POTWs also need more time to analyze their influent and, if necessary, conduct sampling to better determine the quantities of HAP in the influent.

NACWA members also need additional time to analyze whether or not facility improvements would be needed to meet the proposed HAP emission fraction, and if so, what the required costs would be for these improvements.

Since the major source determination, influent characterization, facility improvement assessment, and costs estimates are complicated analyses, the comment

period for the proposed POTW NESHAP should be extended. Providing an additional 120 days would allow NACWA and its public utility members the opportunity to provide complete and accurate information to EPA about the proposed rule.

Thank you for your consideration of this request. Please contact me at cfinley@nacwa.org if you have any questions or need more information.

Sincerely,

A handwritten signature in black ink that reads "Cynthia A. Finley". The signature is written in a cursive style with a large initial "C" and a long, sweeping tail on the "y".

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