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March 23, 2016

Leif Hockstad

U.S. Environmental Protection Agency

Climate Change Division

1200 Pennsylvania Ave, NW

Washington, DC 20460

Via Email: Hockstad.Leif@epa.gov

**Re: NACWA Comments on Wastewater Treatment Emissions Estimates in EPA's
Draft *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014***

Dear Mr. Hockstad:

The National Association of Clean Water Agencies (NACWA) appreciates this opportunity to comment on the U.S. Environmental Protection Agency's (EPA) draft *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014 (Inventory)*, and specifically Section 7.2, *Wastewater Treatment (IPCC Source Category 5D)*. NACWA represents the interests of nearly 300 publicly owned wastewater treatment agencies nationwide, serving the majority of the sewered population in the U.S. NACWA members want to ensure that greenhouse gas (GHG) emissions from wastewater treatment facilities be characterized correctly in the *Inventory*, since the *Inventory* is a frequently-cited reference for GHG information.

NACWA has submitted comments on each of the previous nine *Inventories*, and we appreciate the clarifications that EPA has made to clarify the emissions calculations and the factors that are used in the calculations. Although the wastewater treatment section has not yet been updated for the 2014 *Inventory*, EPA states that the same methodology will be used as in the previous *Inventory*. NACWA previously stated its concern that potentially outdated data was used in the emissions calculations (e.g., the 2004 Clean Watershed Needs Survey). If the same data is used in the 2014 *Inventory*, our concern remains that the calculations may not accurately reflect current wastewater utility practices. NACWA also believes that more specific emissions factors could be developed for U.S. wastewater treatment.

NACWA understands that EPA will be looking at possible improvements for the wastewater treatment calculations in the next year. NACWA is willing to assist EPA

NACWA Comments on 2014 GHG Inventory

March 23, 2016

Page 2 of 2

in any way with these improvements, such as providing general information about current wastewater practices or collecting specific data from our member utilities.

Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cynthia A. Finley". The signature is written in a cursive style with a large, prominent initial "C".

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