



PRESIDENT

**Dick Champion, Jr.**  
*Director*

Independence Water Pollution  
Control Department  
*Independence, MO*

VICE PRESIDENT

**Christopher M. Westhoff**  
*Assistant City Attorney*  
*Public Works General Counsel*  
City of Los Angeles  
*Los Angeles, CA*

TREASURER

**Marian Orfeo**  
*Director of Planning*  
*& Coordination*  
Massachusetts Water  
Resources Authority  
*Boston, MA*

SECRETARY

**Kevin L. Shafer**  
*Executive Director*  
Milwaukee Metropolitan  
Sewerage District  
*Milwaukee, WI*

EXECUTIVE DIRECTOR

**Ken Kirk**

August 25, 2006

Air and Radiation Docket and Information Center  
Environmental Protection Agency  
Mailcode: 6102T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**Re: Proposed Standards of Performance for Stationary Spark Ignition  
Internal Combustion Engines and National Emission Standards for  
Hazardous Air Pollutants for Reciprocating Internal Combustion  
Engines, 71 FR 33804-33855**

**Attention Docket ID No. EPA-HQ-OAR-2005-0030**

Dear Sir or Madam:

These comments are submitted on behalf of the National Association of Clean Water Agencies (NACWA) regarding the new standards proposed by the United States Environmental Protection Agency (EPA) for internal combustion engines. NACWA represents the interests of nearly 300 publicly owned wastewater treatment works (POTWs) nationwide. NACWA's members serve the majority of the sewered population in the United States, and collectively treat and reclaim more than 18 billion gallons of wastewater each day. The proposed standards for internal combustion engines will affect many of NACWA's members who rely on reciprocating engines fired on various fuels for their wastewater treatment operations.

NACWA has carefully read the proposed regulations and attempted to summarize them for its members. Unfortunately, the format of the document does not make it easy for the reader to comprehend the regulations, despite the inclusion of tables designed to summarize the requirements in the text. NACWA suggests that EPA prepare flowcharts of common scenarios for owners and operators to supplement or possibly even replace the existing tables. The flowcharts would more clearly guide owners and operators of internal combustion engines through both Subpart JJJJ and Subpart ZZZZ by describing the applicable certification, notification, reporting, and recordkeeping requirements in a sequential step-by-step fashion.

Proposed Standards for Combustion Engines

August 25, 2006

Page 2 of 2

Existing engine scenarios that would be of particular interest to NACWA members are reciprocating internal combustion engines that are located at an area source and use either natural gas or digester gas.

Thank you for consideration of this request to improve the format of the proposed regulations, which will increase the ability of wastewater treatment agencies to comply with the regulations and the ability of EPA and the states to enforce them. If you have any questions, please contact me at 202/833-9106 or [chornback@nacwa.org](mailto:chornback@nacwa.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hornback". The signature is fluid and cursive, with a large initial "C" and "H".

Chris Hornback  
Director, Regulatory Affairs