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September 28, 2006

Christopher Recchia
Executive Director
Ozone Transport Commission
Hall of the States, Suite 638
444 North Capitol Street
Washington, DC 20001

Re: Candidate Control Measures for Publicly Owned Treatment Works (POTWs)

Dear Mr. Recchia:

The National Association of Clean Water Agencies (NACWA) represents the interests of nearly 300 POTWs nationwide, including over 70 agencies in the Ozone Transport Commission (OTC) region. NACWA has reviewed the Commission's proposed control measures for POTWs, and we have spoken with Seth Barna of OTC and Ed Pellegrini, the POTW Category Lead, about the control measures. From these conversations, we understand that the OTC draft Control Measure Summary for POTWs dated January 13, 2006, is no longer under consideration for the current round of implementations and that POTWs are now listed as "requiring further review." We wanted to share with you our support for this decision due to our concerns about the viability, cost, and necessity of the proposed control measures.

As you know, the Control Measure Summary presented two candidate measures, with Candidate Measure 1 recommended for adoption by the state/workgroup lead. Candidate Measure 1 calls for expanding the Maximum Achievable Control Technology (MACT) standard presented in 40 CFR Part 63 Subpart VVV, National Emissions Standards for Hazardous Air Pollutants: Publicly Owned Treatment Works. This measure would require "covers on all primary treatment processes up to the secondary treatment chamber with emissions routed to a carbon adsorption unit or other control device which can achieve 85 percent control or greater."

NACWA was heavily involved in the seven years of negotiations that resulted in the POTW MACT standard. During these negotiations, NACWA maintained that activated carbon was not a viable or cost-effective volatile organic compound

(VOC)/air toxics control alternative at POTWs for the reasons described herein. NACWA continues to hold this position. The MACT was established based on data from observations made at the Sanitation Districts of Los Angeles County Joint Water Pollution Control Plant (JWPCP), which is not representative of other POTWs. The JWPCP, one of the largest wastewater treatment plants in the world, was charging local refineries a fee for removal of benzene as part of a California "hot spots" toxics reduction program. The refineries paid the POTW directly for all labor and materials to reduce benzene emissions using activated carbon. The covers on the primary treatment processes at the JWPCP cost \$6.5 million to install and the emissions treatment system utilizing activated carbon cost \$10 million. Activated carbon adsorption units work well as odor scrubbers in aerobic environments, where they essentially act as biofilters and can last for years reducing hydrogen sulfide-laden air streams. However, the active sites of the carbon are rapidly filled with water from the moisture saturated environments of POTW air streams. The carbon must be changed at least once a month due to plugging with water, making the benzene control program extremely expensive to operate. Activated carbon therefore is not a reasonable option for controlling VOCs/air toxics for most POTWs due to this excessive cost and increased labor.

Additional controls for POTWs do not seem warranted given their relatively minor contribution of VOC emissions compared to other sources. Southern California's South Coast Air Quality Management District ordered a comprehensive field testing and data analysis program of POTW emissions in 1994. VOC and odor emissions were measured at the 22 large-capacity POTWs (at least 10 mgd) in the South Coast Air Basin, which encompasses 13,350 square miles and, at the time of the study, had over 13 million residents. The basinwide VOC emissions estimate for the participating POTWs was 0.46 tons per day. Adding the estimated emissions for the 60 facilities in the Basin with a capacity of less than 10 mgd, the total emission of VOCs from POTWs was still only about 0.5 tons per day. This represented only 0.03 percent of the total VOC emissions in the Basin, even less than the contribution of commercial bakeries. Although different locations may have various sources and amounts of VOC emissions, this study demonstrates that POTWs are relatively small contributors to area-wide VOC emission totals.

Because of the high costs and limited benefits, NACWA agrees with OTC's decision not to consider additional VOC emission controls for POTWs at the current time. If OTC decides to investigate emission controls for POTWs in the future, NACWA is willing to consider assisting in the process. NACWA and its members may be able to give OTC information about emissions and emission controls at treatment works that would be helpful in determining if additional controls are necessary. If you have any questions, please contact me at 202/833-9106 or chornback@nacwa.org.

Sincerely,



Chris Hornback
Director, Regulatory Affairs

cc: Ed Pellegrini