

Air and Radiation Docket and Information Center  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460  
Attn: Melanie King  
Submitted via email to [king.melanie@epa.gov](mailto:king.melanie@epa.gov)

Re: Docket ID No. EPA-HQ-OAR-2008-0708

The Air Issues and Regulations (AIR) Committee appreciates the opportunity to comment on the proposed national emission standards for hazardous air pollutants (NESHAP) for stationary reciprocating internal combustion engines (RICE). We are aware that the official comment period on this proposed rule has closed; however we are hopeful that our comments may still be considered in the development of this rule and future related regulations.

The AIR Committee is a coalition of San Francisco Bay Area Publicly Owned Treatment Works (POTW) working cooperatively to address air quality issues under the guidance of the Bay Area Clean Water Agencies (BACWA). Many of our member agencies also manage potable water treatment and distribution systems, wastewater collection and treatment systems, recycled water treatment and distribution systems, and biosolids residual handling and disposal programs. The AIR Committee has 18 member agencies, including large metropolitan facilities such as East Bay Municipal Utility District, the City and County of San Francisco, Central Contra Costa Sanitary District, and the City of San Jose. Together, AIR Committee member agencies treat over ninety percent of the municipal wastewater in the Bay Area.

Many of our members, in an effort to use green energy to power wastewater plant operations, run large internal combustion engines fired on landfill or digester gas that would be subject to the emission standards and requirements presented in Table 2 - namely a carbon monoxide (CO) standard of 177 ppmvd at 15% O<sub>2</sub>.

The AIR Committee is concerned about the specific proposed requirements and their impact on wastewater facilities' efforts to use landfill and digester gas. In utilizing landfill and digester gas in their engines, wastewater utilities simultaneously reduce their reliance on fossil fuel sources and reduce greenhouse gas emissions by beneficially reusing methane, a

potent greenhouse gas. The proposed emission limits have the potential to discourage use of these green alternative fuel sources at wastewater utilities across the country.

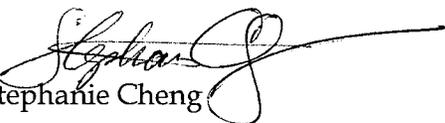
The AIR Committee echoes the comments of the National Association of Clean Water Agencies (NACWA) that low emission levels for existing landfill and digester gas fired engines are not appropriate. As noted by NACWA, new emissions controls on existing engines, if they are even technically feasible, are likely to cost millions of dollars and will create situations where it is more cost-effective for utilities to purchase power from local electric utilities and waste the landfill or digester gas, a valuable resource, by flaring it.

An add-on control for CO, such as a catalyst, may not have any impact on HAPs, so under this proposed rule, public money would be wasted on controlling CO without any HAP benefit. A better approach would be to have the choice of meeting either a CO limit or a Total Organic Carbon (TOC) limit (similar to 503 sewage sludge incinerator regulations). TOC is almost a direct measure of HAP destruction. This gives flexibility to the owner/operator while still minimizing HAP emissions.

Further, we note that the Tier 4 emissions standards in California Air Resources Board (CARB)'s regulation for Off-road Vehicles and Engines Pollution Control Devices are significantly higher than the emission limits proposed in this NESHAP. CARB's Tier 4 engine standard represents the best technology expected to be on the market in the next five years, and even these Tier 4 engines would not meet the proposed NESHAP CO limits for several categories of engines. The Tier 4 CO standard is 3.5 g/kWh, which converted to volume, is an order of magnitude greater than the proposed NESHAP standard for Emergency CI HP>500, and several times the proposed limit for large landfill and digester gas fired engines.

Thank you for your consideration of our comments on the proposed NESHAPs for RICE. Please contact me at (510) 287-1337 or [scheng@ebmud.com](mailto:scheng@ebmud.com) if you have any questions about the AIR Committee's comments.

Sincerely,

  
Stephanie Cheng

Chair, Air Issues and Regulations Committee