CALIFORNIA WASTEWATER CLIMATE CHANGE GROUP

1737 North First Street, Suite 300, San Jose, California 95112

May 22, 2008

National Water Program
Office of Water, US EPA
1200 Pennsylvania Avenue, NW, Mail Code 4101M
Washington, D.C. 20406

Attention: National Water Program Draft Climate Change Strategy

As requested in the memorandum from Mr. Benjamin Grumbles dated March 28, 2008, the California Wastewater Climate Change Group (CWCCG) has completed the review of the Draft *National Water Program Strategy: Response to Climate Change* (Draft *Strategy*).

Member agencies of the CWCCG treat approximately 90% of municipal wastewater in the state of California. The primary purpose of the CWCCG is to respond to climate change and forthcoming regulations and to provide a unified voice for the California wastewater industry.

As EPA moves forward to implement climate change strategies, we ask that EPA's climate change workgroup consider the following:

- Work with other state and local agencies to integrated permitting regulations and climate change considerations so that a holistic approach tying in effluent standards with GHG reductions is obtained,
- Work with other state and local agencies to promote reuse projects that would result in GHG emission reduction,
- Provide funding for agencies to upgrade wastewater infrastructure and projects that provide reduction in GHG emissions.

The CWCCG also encourage the EPA to formally adopt The Climate Registry as the GHG inventory database of record for the entire U.S. as well as recommend the regulated entities to follow The Climate Registry's Reporting and Verification Protocols.

Our specific comments related to a specific section in the Draft *Strategy* are attached. The CWCCG appreciate the opportunity to review and comment on the Draft *Strategy.* Please contact Helen Hu at 916-876-6098 or HuH@SacSewer.com if you have any questions concerning our comments.

Sincerely,

Daniel McGivney Randy Schmidt, P.E. Helen Hu, P.E.

Sections	Comments
II – Climate Change Impacts on Water Resources	EPA should consider evaluating the GHG emissions associated with current and future water quality standards for ***all*** pollutants, not just those pollutants anticipated to increase as a result of climate change. Increasingly stringent standards are met by increasing the treatment of water and wastewater, often involving increased chemical and energy use, which are ultimately tied to increases in GHG emissions.
	EPA should also consider impacts on Wastewater Programs in extreme events such as increased rainfall or decreased snow levels and provide assistance and/or funding to agencies that are proactively implementing projects or programs to mitigate such catastrophic events. Consequences of such catastrophic events may include the following: • In drought conditions, water conservation measures and decreased runoff will lead to: - Higher contaminant concentrations in wastewater, affecting the efficacy of existing treatment processes - Reduced wastewater flow through sewer pipes, leading to increased rates of corrosion • In high rainfall conditions, increased stormwater will lead to: - Increased infiltration to wastewater treatment plants (WWTPs) - Potentially increased incidents of SSOs for those facilities that have combined sewer systems
	EPA should promote and provide funding for projects that promote the reuse of wastewater residuals such as the production of fertilizers from biosolids, low-carbon biofuels from biosolids, grease, and other process residuals. These projects will help reduce the overall greenhouse gas emissions.
	EPA should establish policies that are flexible to accommodate regional differences.
III – Climate Change Response Actions	Goal 3 regarding Climate Change Research must result in concrete tools that support pre-emptive measures taken by water utilities to lead the potentially dire consequences of climate change.

Sections	Comments
	The *Strategy* states that ...if all 544 of the large sewage treatment plants in the US operating anaerobic digesters were to install combined heat and power, about 340 megawatts of clean energy could be generated, offsetting 2.3 million metric tons of CO2 emission annually... (page 27). This statement puts a lot of weight on the amount of CO2 reduced, but neglects to include any discussion on the economics and/or regulatory constraints of implementing combined heat and power projects to all 544 facilities. Per EPA 1990-2006 Inventory of U.S, GHG Emission & Sinks, total GHG emission for 2006 is approximately 7,054 million metric tons of CO2e. The projected 2.3 million metric tons reduced from the implementation of such projects would only reduce the national GHG emission level by 0.3%. EPA needs to provide a comparison of the economics and GHG emission reduction when proposing project implementation that may result in GHG emission reduction.
	Key action 18, also needs to incorporate the potential impact at the wastewater treatment plant due to changes in industrial effluent composition.