



VIA EMAIL

August 9, 2012

Carter H. Strickland, Jr.
Commissioner

Re: Docket ID No. EPA-HQ-OAR-2008-0708
Air and Radiation Docket and Information Center
Environmental Protection Agency

Vincent Sapienza, P.E.
Deputy Commissioner
Bureau of Wastewater
Treatment
vsapienza@dep.nyc.gov

Dear Ms. King:

The New York City Department of Environmental Protection (DEP) respectfully submits the following comments on the proposed changes to 40 CFR Part 63, subpart ZZZZ, which establishes operational limitations for reciprocating internal combustion engines (RICE). DEP supports the proposed changes which will allow owners and operators of RICE to participate in an emergency demand response program up to 100 hours per year.

96-05 Horace Harding
Expressway
Corona, NY 11368
T: (718) 595-4906
F: (718) 595-6950

The DEP is a utility providing water supply and wastewater collection and treatment services to the City of New York and a number of upstate communities. These services require operation of a number of large facilities including 14 wastewater treatment plants. These treatment plants are often among the largest power users in their neighborhoods. As such, when the local electric utility experiences stress on the power grid, DEP's ability to switch to generator power is key to avoiding a blackout. The increased amount of time for which DEP may operate its RICE for emergency demand response would allow DEP to help keep the lights on in residents' homes, businesses, and important facilities like hospitals.

The regulation directly benefits DEP by ensuring a reliable power supply at the treatment plants, which protects key equipment from damage caused by a loss of power. Furthermore, the regulation benefits water quality by increasing the plant's ability to continue meeting primary and secondary treatment of wastewater.

DEP recognizes that such a change is only beneficial if states also adopt the proposed regulation. DEP hopes that the EPA will encourage states to implement the changes in the RICE regulations.

DEP appreciates the opportunity to comment on this proposed regulation as well as your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vincent Sapienza'.

Vincent Sapienza, P.E.
Deputy Commissioner
Bureau of Wastewater Treatment