



September 15, 2016

Lisa Swain

National Pollutant Release Inventory (NPRI), Science and Technology Branch
Environment and Climate Change Canada / Government of Canada

RE: CWWA Comments on Proposed Changes to Reporting of PAH to the NPRI

I'm writing on behalf of the Canadian Water and Wastewater Association and our Wastewater and Stormwater and Biosolids Committees.

We have reviewed the proposed changes to the reporting for PAHs. Our conclusion is that the reduced reporting thresholds may increase the number of wastewater treatment facilities, biosolids processing operations and even water treatment plants required to report PAHs. However, very little testing is available of PAH levels in facilities, and analytical methods are limited when dealing with such dilute streams. Existing reporting is already based on emissions factors and best guesses derived from the non-detect limits in samples. Reporting can be triggered for many high volume facilities with barely detectable levels. Thus, reducing the reporting threshold will not improve available data on PAHs from our members, but rather increase the number of facilities providing a best guess at emissions..

Thus far, our members found the work required merely to assess existing data and calculate emissions, to determine if they will be required to report to be a significant undertaking. The revised reporting requirements will increase the already significant administrative burden associated with reporting to the NPRI, while having little positive impact on the available scientific data.

Asphalt releases of PAH's has been reviewed by Environment Canada and Climate change and concluded that low concentrations were not having an impact on the Environment and we would suggest the same for PAH's that could be found in biosolids

It is our view that alternate thresholds should be applied to industrial emitters of concern – those with verifiable testing and known emissions - rather than a blanket requirement for all reporters. This will ensure a higher quality of data reported, and reduce the burden for other reporters.

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Thank you for your consideration

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