



**ASSOCIATION OF
METROPOLITAN
WATER AGENCIES**

LEADERS IN WATER

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November 3, 2025

Richard Benware
Engineering and Analysis Division
U.S. Environmental Protection Agency
Office of Water
1200 Pennsylvania Avenue NW
Washington, DC 20460

Submitted electronically

Re: Docket ID No. EPA-HQ-OW-2009-0819; Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category – Deadline Extensions

Dear Mr. Benware:

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to comment on the Agency’s proposed revisions to the Effluent Limitations Guidelines (ELGs) and Standards for the Steam Electric Power Generating Point Source Category deadline extensions. AMWA is an organization representing the largest publicly owned drinking water utilities in the United States, and its membership collectively serves more than 160 million people. AMWA has long engaged with EPA’s actions regarding ELGs for steam electric power plants. While the Association recognizes this Administration’s concerns for ensuring electricity reliability, as drinking water stewards, the Association stresses the importance of including adequate protections for drinking water sources to protect public health. Specifically, AMWA would like to highlight the potential negative impacts to downstream drinking water systems that could result from EPA’s proposed deadline extensions.

Chemical discharges from steam electric power plants have unique and concerning downstream effects for drinking water systems. For over a decade, AMWA and partner organizations have articulated the chemical

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and operational challenges that result from bromide discharges from steam electric power plants.^{1,2,3} First, bromide is a natural component of coal, and it is added to coal to reduce mercury air emissions. When power plants utilities utilize wet scrubbers, a type of flue gas desulfurization system (FGD), they discharge bromide mainly through wastewater. After release into drinking water sources, like rivers and other sources, bromide discharges from steam electric power plants interact with water systems' disinfection processes, resulting in elevated levels of brominated disinfection byproducts (DBPs) throughout downstream water systems. In fact, research from Pennsylvania has demonstrated that bromide loading from coal-fired power plant FGD systems increases the level of bromide concentrations in a source waters.⁴ Brominated disinfection byproducts are of public health concern, as there is a suggested link between elevated levels of brominated disinfection byproducts and bladder cancer.⁵ AMWA is therefore concerned that extensions to the proposed waste streams will allow further bromide and other chemical loadings to source waters.

Furthermore, extending the deadline of the Steam Electric ELG waste stream deadlines will allow steam electric power plants to pass off risk management, and costly treatment, to downstream drinking water utilities and the communities they serve for longer. It is more cost effective for power plants to reduce bromide and other chemicals through effective control measures prior to discharge, compared to having water systems install additional treatment to reduce these chemicals, at a cost to their ratepayers.

Finally, AMWA strongly supports EPA continuing to support increased monitoring and implementation of the best available technologies to reduce and eliminate bromide discharges at steam electric power plants. AMWA has previously weighed in on its support for various available and effective control options², arguing that there are options available to reduce the risks to drinking water sources and public health.

We appreciate the opportunity to comment on the proposed deadline extensions to the Steam Electric ELGs. If you have any questions about the contents of this letter, please contact AMWA's Direct of Regulatory Affairs, Jessica Evans, at evans@amwa.net.

Sincerely,



¹ September 30, 2013 joint comments from AMWA and others
(<https://www.amwa.net/testimonycomments/comments-epa-steam-electric-elgs>)

² June 8, 2018 letter from AMWA and AWWA to Administrator Pruitt
(<https://www.regulations.gov/document/EPA-HQ-OW-2009-0819-7598>)

³ March 25, 2022 federalism consultation comments (<https://www.amwa.net/system/files/linked-files/AMWA%20Steam%20Electric%20ELG.pdf>)

⁴ Good, K. D., & VanBriesen, J. M. (2017). Power plant bromide discharges and downstream drinking water systems in Pennsylvania. *Environmental Science & Technology*, 51(20), 11829-11838.

⁵ Hrudey, S. E., Backer, L. C., Humpage, A. R., Krasner, S. W., Michaud, D. S., Moore, L. E., ... Stanford, B. D. (2015). Evaluating Evidence for Association of Human Bladder Cancer with Drinking-Water Chlorination Disinfection By-Products. *Journal of Toxicology and Environmental Health, Part B*, 18(5), 213-241.
<https://doi.org/10.1080/10937404.2015.1067661>

The Honorable Lee Zeldin
November 3, 2025
Page 3 of 3

Tom Dobbins
Chief Executive Officer

cc: Jennifer McLain, OGWDW
Eric Burneson, OGWDW