



March 25, 2022

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

Re: Docket ID No. EPA-HQ-OW-2009-0819, federalism consultation for revisions to the Steam Electric Power Generating Effluent Limitations Guidelines and Standards

Dear Mr. Benware,

The Association of Metropolitan Water Agencies (AMWA) is an organization representing the largest publicly owned drinking water utilities in the United States. AMWA appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) federalism consultation on potential revisions to the Steam Electric Power Generating Effluent Limitations Guidelines and Standards (Steam Electric ELG). AMWA supports the revision of these guidelines and stresses the importance of including adequate protections for drinking water sources to protect public health. Specifically, AMWA strongly urges EPA to consider the impacts of the discharge of bromide on water systems downstream from steam electric power plants.

The association and its partners have previously expressed concern with bromide discharges regarding Steam Electric ELG^{1,2}. The contribution of bromide from steam power plants to source waters can result in elevated brominated disinfection byproducts at downstream water systems. AMWA believes EPA must take steps to limit the discharge of bromide into drinking water sources through revisions to the Steam Electric ELG. Otherwise, the cost of drinking water

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>)

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treatment of downstream source waters falls entirely on utilities and, by extension, ratepayers rather than those directly responsible for the contamination.

AMWA strongly supports increased monitoring and implementation of the best available technologies to reduce and eliminate bromide discharges at steam electric power plants. AMWA remains committed to working with EPA to ensure public access to safe drinking water and the protection of public health and safety.

AMWA sincerely appreciates the opportunity to comment on the federal consultation for revisions to the Steam Electric Power Generating Effluent Limitations Guidelines and Standards. If you have any questions, please contact AMWA's Manager of Regulatory and Scientific Affairs Brian Redder (Redder@amwa.net).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Arceneaux', with a long horizontal flourish extending to the right.

Michael Arceneaux
Acting Chief Executive Officer

cc: Jennifer McLain, OGWDW
Eric Burneson, OGWDW
Robert Wood, OST