



May 30, 2023

Michael S. Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

*Via electronic submission*

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

Dear Administrator Regan,

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) revisions to the Steam Electric Power Generating Effluent Limitations Guidelines (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 agrees with EPA's actions aimed at mitigating the discharge of bromide and other harmful chemicals into drinking water sources from steam electric power plants, as it poses significant risks to downstream water systems.

The association and its partners have previously expressed concern with bromide discharges regarding Steam Electric ELG<sup>1,2,3</sup>. The contribution of bromide from steam power plants to source waters can result in elevated brominated disinfection byproducts (DBPs) at downstream water systems. AMWA supports EPA taking steps to limit the discharge of bromide into drinking water sources through revisions to the steam electric ELG. Otherwise, the cost of

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

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

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

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treatment of downstream source waters falls entirely on public water systems 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. Reductions in bromide and other DBP precursors will have cascading beneficial effects, as the National Drinking Water Advisory Council has formed a working group to examine revisions to the microbial and DBP (MDBP) rules. Working group meetings have included robust discussions on brominated DBPs and their health effects. Eliminating the source of bromide will help water systems comply with current and future MDBP rule requirements.

AMWA sincerely appreciates the opportunity to comment on the revisions to the Steam Electric ELGs. If you have any questions, please contact AMWA's Manager of Regulatory and Scientific Affairs, Brian Redder, at [Redder@amwa.net](mailto:Redder@amwa.net).

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Dobbins".

Tom Dobbins  
Chief Executive Officer

cc: Jennifer McLain, OGWDW  
Eric Burneson, OGWDW  
Richard Benware, OST  
James Covington, OST