American Water Works Association
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Addressing bromide discharges will help protect public health

- Discharges of bromide into water bodies ultimately used as sources of drinking water poses a significant public health concern, as bromide (which cannot be economically removed at the water treatment plant) increases carcinogenic brominated disinfection byproducts.

- AWWA and its partners have repeatedly outlined their concerns, both in public comments and in *Southwestern Electric Power Co., et al. v. EPA (No. 1560821)* around discharges from Flue Gas Desulfurization (FGD) wastewater, containing bromide naturally present in coal and bromide added to coal for mercury control and tax incentives.

- The Steam Power ELG rule revisions will better protect public heath with a zero liquid discharge (ZLD) requirement for FGD wastewater. Recognizing this was not the preferred option in the rule proposal, the strongest combination of other measures (monitoring and reporting, required minimization plans, and limits in the VIP program as included in the proposal) should be chosen if ZLD is not.

Relevant publicly available documents:

- AWWA January 21, 2020 Comments on the 2019 "Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category" proposal (EPA-HQ-OW-2009-8312)

- AWWA's December 2019 report "Methods to Assess Anthropogenic Bromide Loads from Coal-fired Power Plants and Their Potential Effect on Downstream Drinking Water Utilities."

- April 17, 2019 AWWA comments on the "National Emission Standards for Hazardous Air Pollutants: Coal and Oil-Fired Electric Utility Steam Generating Units – Reconsideration of Supplemental Finding and Residual Risk and Technology Review (EPA-HQ-OAR-2018-0794-1152).

- July 6, 2017 AWWA and NAWC comments on "Postponement of Certain Compliance Dates for the Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category" (EPA-HQ-OW-2009-0819-6624).