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September 20, 2013

Water Docket

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Via email: OW-Docket@epa.gov

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

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the proposed effluent limitation guidelines (ELG) for steam electric power generating point sources. NACWA represents the interests of nearly 300 public clean water agencies nationwide. NACWA members operate highly successful pretreatment programs and are actively involved in efforts to reduce the quantities of pollutants that are discharged into the sewer system. NACWA's comments below are related to the proposed pretreatment standards for steam electric power generating stations.

EPA proposes an exemption from new copper and iron standards for discharges of nonchemical metal cleaning wastes that are currently authorized. For existing sources, the decision about whether a steam electric power generating facility should qualify for this exemption or not should be left to the publicly owned treatment work (POTW) serving as the facility's control authority, and not prescribed in the ELG. The POTW understands the facility's permit and the necessary discharge limits to protect the POTW and its receiving waters and threshold decisions, such as whether to exempt such facilities, are best left to the experts – the POTW.

In addition, some steam electric power generating facilities that currently burn coal are planning to switch to natural gas within the next several years. After this switch occurs, the steam tubes will need cleaning less frequently, perhaps only once every five years on average. The POTW is best equipped to determine if any controls are needed on the low volume of wastewater generated by these infrequent cleaning events.

EPA used the 1982 50 POTW Study to determine POTW removal efficiencies for arsenic and mercury. However, the 50 POTW Study is now over 30 years old, and the removal efficiencies in the Study are no longer valid. Treatment technologies at most POTWs have improved since the Study was completed, and pretreatment programs have significantly reduced concentrations of pollutants, which impact treatment plant removal efficiency values. NACWA has communicated with EPA in the past about the need to update the 50 POTW Study and to allow POTWs to calculate removal efficiencies rather than use the outdated information in the Study, and copies of these communications can be provided to EPA if requested. For the proposed ELG and other ELGs that are developed in the future, EPA should use a different basis for determining removal efficiencies rather than relying on the outdated 50 POTW Study.

Thank you for your consideration of these comments on the draft ELG. Please contact me at 202-533-1836 or cfinley@nacwa.org if you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Cynthia A. Finley".

Cynthia A. Finley, Ph.D.
Director, Regulatory Affairs