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Riverkeeper * Sierra Club * Southern Alliance for Clean Energy * Southern Environmental Law Center * Spokane Riverkeeper * Stewards of the Lower Susquehanna, Inc. * St. Johns Riverkeeper, Inc. * St. Louis Ethical Society *Suncoast Waterkeeper * Tennessee Clean Water Network * Tennessee Riverkeeper * Three Rivers Waterkeeper * Toe River Valley Watch * Uniting People with Opportunities * Upper Missouri Waterkeeper * Valley Watch * Wabash Riverkeeper * Watauga Riverkeeper * Waterkeeper Alliance * Western North Carolina Alliance * Western Organization of Resource Councils * World Temperate Rainforest Network * Yadkin Riverkeeper Inc

September 20, 2013

Water Docket
U.S. Environmental Protection Agency,
Mail Code 4203M
1200 Pennsylvania Ave, NW
Washington, DC 20460

Attention Docket ID No. EPA-HQ-OW-2009-0819

Comments on Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category

The undersigned organizations appreciate the opportunity to comment on EPA's proposed *Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category*. **Our organizations urge EPA to select Option 5 for the final rule. Option 5 would eliminate almost all toxic discharges from power plants, reducing pollution by more than 5 billion pounds a year.** Strong rules are urgently needed because Steam Electric Power Plants are responsible for at least 50 to 60 percent of the toxic pollutants discharged into waters of the U.S. - more than the other nine top polluting industries *combined*.[1] Despite the scope of this pollution problem, the existing standards have not been updated since 1982 and fail to set discharge limits on a long list of dangerous pollutants toxic to humans and aquatic life, including arsenic, mercury, lead and selenium. According to EPA, this failure has led to over 160 water bodies not meeting state water quality standards, 185 waters with fish consumption advisories and the degradation of 399 water bodies across the country that are drinking water supplies.[2]

The Clean Water Act requires states to set strong discharge standards for polluters in the absence of federal standards.[3] Unfortunately, most state permitting agencies have failed to set limits in discharge

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[1] EPA, *Environmental Assessment for the Proposed Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category* 3-14 (April 2013)
[2] http://water.epa.gov/scitech/wastetech/guide/steam-electric/proposed.cfm
[3] 33 U.S.C. § 1314 (b); 40 C.F.R. § 122.44(a)(1), 123.25, 125.3

permits for individual plants that reflect the best available treatment technology and protect water quality. In fact, a coalition of environmental groups recently released a report that found that nearly 70% of the power plants that discharge coal ash wastewater or sludge from flue gas desulphurization ("FGD") systems, also known as scrubbers, have NO limits for arsenic, boron, cadmium, lead, mercury, and selenium, all of which are toxics commonly found in these wastewater streams.[4]

EPA has an obligation under the Clean Water Act to end this reckless practice. Our organizations urge the Agency to move forward with Option 5, which would require power plants to control all of their pollution, not just some of it. EPA has proposed eight regulatory options, four of which are "preferred." Yet none of the Agency's "preferred" regulatory options are adequate to address this widespread pollution problem. The most stringent "preferred" option proposed by EPA (option 4a) would eliminate only 2.62 billion pounds of pollution – roughly less than half of all the annual pollution loading from power plants[5]. In contrast, Option 5, though not preferred by the Agency, would eliminate 96% of all pollution from power plants, cutting an estimated 5.3 billion pounds a year.[6] For decades, the power plant industry has been given a free pass to dump their toxic wastewater into our rivers, lakes, streams and bays, but EPA's analysis of Option 5 demonstrates that we can virtually eliminate this predominant source of toxic pollution to our waters using technologies that are readily available and affordable to the industry.

Our organizations support EPA's proposal to require "zero discharge" of fly ash wastewater for all existing power plants. Wastewater treatment technologies that can drastically reduce or even eliminate discharges of toxic fly ash pollution are already in use at some power plants. Since 1982, new power plants have been required to dry handle their fly ash, so industry has more than 30 years of experience installing systems that eliminate fly ash transport water. In fact, 80% of existing power plants have already completely eliminated discharges of fly ash wastewater.[7] The remaining 20% of plants that rely primarily on "settling ponds" to treat fly ash are decades behind upgrading to the best available technology. Settling ponds are ineffective at treating dissolved metals and nutrients and when plants discharge wastewater from ash settling ponds into surface water they can impair water quality and cause ecological damage to aquatic systems. EPA has already documented dozens of cases where power plant water pollution has harmed aquatic ecosystems.[8]

Our organizations urge EPA to require "zero discharge" of bottom ash wastewater for all new and existing power plants, as proposed under Options 4 or 5. Approximately 42% of existing coal and coke units have also eliminated discharges of bottom ash wastewater by using dry handling or closed-loop systems.[9] Even though a large portion of the power plant sector has already moved away from

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[4] Environmental Integrity Project, Sierra Club, Clean Water Action, Earthjustice and Waterkeeper Alliance, *Closing the Floodgates: How the Coal Industry is Poisoning Our Water and How We Can Stop It* (2013), *available at* http://cleanwater.org/files/publications/closing-floodgates.pdf

[5] 78 Fed. Reg. at 34,485- 34,486 (Table IX-4)

[6] *Id.*

[7] *Id*. at 34,439

[8] EPA, *Environmental Assessment for the Proposed Effluent Limitation Guidelines and Standards for the Steam Electric Power Generating Point Source Category* See Appendix A, Tables A-1, A-8, and A-10

[9] 78 Fed. Reg. at 34,470

discharging bottom ash wastewater, none of EPA's "preferred" options would require all of the remaining 60% of plants to follow suit. Three "preferred" options would require NONE of those power plants to use dry handling or closed-loop systems to eliminate their bottom ash wastewater discharges, and Option 4a would only require coal-burning boilers with a generating capacity above 400 MW to do so.[10] The remaining plants under each of these options would still be allowed to use settling ponds as the only treatment method, even though the Agency has repeatedly acknowledged that ponds are not effective at treating pollutants of concern.[11] The industry itself already recognizes that dry handling of bottom ash is technologically available and affordable, yet EPA's "preferred" options for bottom ash handling ignores this trend.

Our organizations urge EPA to require chemical precipitation plus vapor evaporation to treat FGD wastewater, as proposed under Option 5. FGD, or "scrubber" wastewater is especially toxic, and this wastestream will only increase in volume and toxicity as more power plants install scrubbers to control air pollutants. Unfortunately, much of that toxic waste is ending up in our water. Of the 145 power plants identified by EPA to generate scrubber wastewater, over half use only surface impoundments (settling ponds) to treat that wastewater.[12] As mentioned previously, ponds are ineffective at treating dissolved metals, nutrients and total dissolved solids. Most of the options proposed by EPA would require existing and new power plants to control scrubber wastewater with a combination of chemical and biological treatment. However, neither of those technological options effectively treat for bromide and other total dissolved solids. Bromide is of particular concern for plants that discharge near drinking water intakes because it can create harmful byproducts when mixed with disinfectants used to treat drinking water. Vapor evaporation technology exists that can reduce scrubber discharges to near zero, the only way to eliminate this source of bromides from our drinking water supplies.

When considering costs, the Clean Water Act allows EPA to evaluate whether costs can be reasonably borne by the industry as a whole.[13] EPA acknowledges in its proposal that Option 5 would by far remove the largest amount of pollutants from power plant discharges, resulting in the greatest benefit to public health and the environment.[14] And EPA has estimated that most utilities would only incur costs of less than 1% of annual revenue.[15] Yet the Agency claims it did not select Option 5 as a "preferred" option because of concern that it is too expensive when compared with the other options. Clearly this industry can bear the comparatively small cost to comply with requirements mandated by the Clean Water Act to clean up their toxic discharges. Society has been unfairly forced to bear the cost of these discharges for decades.

Our organizations urge EPA to monetize the benefit of reduced costs for drinking water treatment, reduced non-cancer health impacts and other benefits mentioned in its analysis but not monetized in

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[10] *Id.* at 34,458 (Table VIII-1)
[11] *Id.* at 34,476
[12] 78 Fed. Reg. at 34,451
[13] See *Waterkeeper Alliance v. U.S. EPA,* 399 F.3d 486, 516 (2d Cir. 2005) and *Rybachek v. U.S. EPA,* 904 F. 2d 1276, 1290-91 (9th Cir. 1990)
[14] *Id.* at 34,473
[15] *Id.* at 34,494 (Table XI-4); 34,493

order to provide a more accurate assessment of the benefits of the proposed rule. Though not required by the Clean Water Act and not allowed to be used to determine best available technology to achieve effluent reductions,[16] EPA conducted a cost-benefit analysis to accompany this proposal.[17] Our organizations are concerned that the Agency chose not to monetize certain benefits, particularly the reduced cost of drinking water treatment for pollutants with drinking water criteria. By EPA's own estimate, nearly 400 water bodies that are sources of drinking water have been degraded by power plant water pollution. The agency also did not monetize non-cancer health benefits (other than IQ benefits from reduced childhood exposure to lead and in-utero exposure to mercury), or benefits to tourism.

For decades, power plants have used our water resources as dumping grounds for their toxic wastewater while EPA and the states have turned a blind eye. Fortunately, treatment technologies are available today that can achieve near zero discharge of pollution at a cost that is affordable to the industry as a whole. EPA must also make these more protective standards effective as soon as possible, rather than giving the industry eight years to comply, as has been proposed. **Our organizations urge EPA to move swiftly to finalize Option 5, which would eliminate billions of tons of pollution a year, resulting in thousands of river miles that are safer to swim and fish in, and thousands of miles of cleaner drinking water sources.**

Sincerely,

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[16] http://www.cleanwateraction.org/files/publications/OMB%20Letter_4_15_filed2-1.pdf
[17] *Id.* at 34,503

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