

Oct 11, 2012

Kevin Coyne  
Water Quality Standards Program  
WVDEP  
601 57th St. S.E.  
Charleston, WV 25304

Re: Revisions to WV Water Quality Standards

Kevin,

In regards to your next Triennial Review of WV Water Quality Standards, please include the protection of public drinking water supplies from being subjected to significant increases in concentrations of Bromide, which is recognized by USEPA as a precursor to formation of Disinfection By-Products.

The USEPA, ORSANCO and the states of West Virginia, Pennsylvania, and Ohio have each begun the process of collecting information on Bromide concentrations and DBP formation, in order to establish a Bromide standard(s) that is protective of drinking water supplies.

Any numeric criteria for Bromides established for this purpose should be protective of water treatment plants that use "processes as commonly employed", as expressed under the existing narrative conditions in 3.2.h., rather than some expensive, uncommonly used alternative process.

Although there may be no precedents of existing numeric water quality criteria for Bromide established by a state, the federal government, or a river basin commission, there are examples of Bromide benchmarks that may prove useful.

The public water supply for central California, CALFED, has established its own in-house target of 50 ppb Bromide in its source water, and the city of Birmingham, Alabama has obtained a court order for an upstream wastewater plant to limit Bromide discharges in order to protect Birmingham's public supply intake from concentrations of Bromide in excess of 50 ppb. Attached are documents that provide some context to these two examples.

Birmingham's water supply may serve as many citizens as all of our state's supplies put together, and CALFED serves a population that is more than ten times our state's total population. West Virginia's relatively small public water supplies should not be expected to commonly employ water treatment processes more capable in handling higher source water Bromide concentrations than these large systems.

Lewis Baker  
WV Rural Water Association  
Source Water Protection Program  
100 Young Street  
Scott Depot, WV 25560