

From: [Goodloe, Robin](#)
To: [Crane, Drew](#)
Subject: Re: Fw: Fwd: 316b Cooling Water Intake Structure Rule - Please respond to HQ by Wednesday, June 12
Date: Wednesday, June 12, 2013 1:24:48 PM

Hi Drew,

My coworkers and I came up with this list of cooling towers we knew about in GA, but that's only about half the number of dots in the state on the EPA map:

Plant Hammond	Coosa River
Plant Bowen	Etowah River
Plant Vogtle	Savannah River
Plant Hatch	Altamaha River
Plant Branch	Lake Sinclair (Oconee?) - GA Power announced will close 2015
Plant McDonough	Chattahoochee River
Plant McMannus	Turtle River
Plant Wansley	Chattahoochee River
Plant Scherer	Lake Juliette
Plant Yates	Chattahoochee River
Plant McIntosh	Savannah River
Plant Kraft	Savannah River
Plant Wilson	
Plant Mitchell	
WGA Generating Plant	

Most of the cooling tower sites listed above are at power plants -- I'm guessing the others are manufacturing facilities? Warm water discharges and/or contaminated discharges from some of the listed power plants possibly impact T&E species downstream, but I think it's more likely that the species simply no longer occur within the reaches of impact -- the warm-water and/or contaminated discharge waters just maintain current baseline conditions downstream, and there's little to no entrainment or impingement. I can't answer your first question about the other towers on EPA's map without more information on the cooling towers. Can EPA provide a list and information about the discharge (water temperature, potential chemical contamination, changes in water color, etc.).


We have not completed any formal consultations or HCPs for facilities with cooling water intake structures.

I think EPA got their blue and orange colored dots on the map mixed up, because we definitely don't have that much critical habitat, in those river basins, in Georgia. Also it appears EPA might have included non-aquatic species in their analysis of facility overlap and T&E species ranges (based on the large number of blue dots in the upper Chattahoochee, which has no listed aquatics). It would be interesting to hear how they created the map.

Sorry not to have more definitive answers to your questions, but the information EPA provided is just too vague.

Robin

- they are aware that this many facilities overlap T&E species in their area?
-

Robin Goodloe, Supervisory Fish and Wildlife Biologist
Georgia Ecological Services
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On Thu, Jun 6, 2013 at 3:58 PM, Crane, Drew <drew_crane@fws.gov> wrote:

Hi Robin,

While the rule itself does not set standards for thermal discharges or other stressors associated with cooling water intakes, it is something we have requested they analyze in the BA as indirect effects. We agree that the rule does have the potential to improve conditions over what they currently are.

However, we don't know how bad of an impact some of these facilities are actually having. Some of the numbers EPA presented to us were pretty scary in terms of take. EPA has also said that the majority of facilities out there will likely not employ a closed cooling system due to costs, but rather use modified fish screens or other technologies to reduce impingement and entrainment.

The other thing to keep in mind is those dots also represent "potentially regulated" facilities. EPA does not really know how many of the facilities that may have cooling water intakes actually take in more than 2MGD/day. It is likely less than what the map depicts but they cannot be sure of that (don't even get me started on that issue).

Thanks for getting back to me on this! I appreciate any additional info you can provide.


Drew

On Thu, Jun 6, 2013 at 3:32 PM, Goodloe, Robin <robin_goodloe@fws.gov> wrote:

Hi Drew,

I did a quick Google on this to see if EPA had published the raw data they used to create the map you attached (because, no, the coworkers I polled and I definitely didn't know there were so many cooling towers in GA! Collectively, we only came up with 15 BIG ones). I'll coordinate with the other GAES offices to answer your 3 questions before your deadline, but first... I found this EPA factsheet on the rule, and it appears their concern about cooling towers focuses on entrainment and impingement. Do you know if EPA also looked at cooling tower impacts on T&E aquatics due to changes in downstream hydrologic regime and increased temperature/reduced DO in water discharges? The final measure described in the factsheet, closed system cooling, actually could result in an improvement to existing baseline conditions and might allow recolonization of habitat (particularly in GA in the Etowah, Coosa, and Altamaha Rivers), where various listed fish and mussels have been extirpated from river reaches within the cooling tower's downstream influence.

http://water.epa.gov/lawsregs/lawsguidance/cwa/316b/upload/factsheet_proposed.pdf

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On Wed, Jun 5, 2013 at 8:29 PM, Sandy Tucker <sandy_tucker@fws.gov> wrote:

If you have any thoughts, they go directly to Drue.

From: Mizzi, Janet [mailto:janet_mizzi@fws.gov]

Sent: Wednesday, June 05, 2013 01:30 PM

To: Mary Jennings <mary_e_jennings@fws.gov>; Bill Pearson <bill_pearson@fws.gov>; Brad Rieck <brad_rieck@fws.gov>; Cary Norquist <cary_norquist@fws.gov>; Chris Davidson <chris_davidson@fws.gov>; Craig Aubrey <craig_aubrey@fws.gov>; Dan Everson <dan_everson@fws.gov>; Dawn Jennings <dawn_jennings@fws.gov>; Deborah Fuller <deborah_fuller@fws.gov>; Donald Imm <donald_imm@fws.gov>; Edwin Muniz <edwin_muniz@fws.gov>; Jay Herrington <jay_herrington@fws.gov>; Jeff Weller <jeff_weller@fws.gov>; Larry Williams <larry_williams@fws.gov>; Laura Rogers <laura_rogers@fws.gov>; Lee Andrews <lee_andrews@fws.gov>; Marelisa Rivera <Marelisa_Rivera@fws.gov>; Peggy Shute <peggy_shute@fws.gov>; Pete Benjamin <pete_benjamin@fws.gov>; Robin Goodloe <Robin_Goodloe@fws.gov>; Sandy Tucker <sandy_tucker@fws.gov>; Stephen Ricks <stephen_ricks@fws.gov>; Thomas McCoy <thomas_mccoy@fws.gov>; Joe Pittman <joe_pittman@fws.gov>

Cc: Kenneth Graham <kenneth_graham@fws.gov>; Michelle Eversen <michelle_eversen@fws.gov>

Subject: Fwd: 316b Cooling Water Intake Structure Rule - Please respond to HQ by Wednesday, June 12

To all Field Offices in the Southeast Region:

Drew Crane in Headquarters has been working with EPA concerning a potential programmatic

consultation for cooling water intake structures (see Drew's note below). At this point Drew is asking a few general questions to get a feel for how often cooling water intake structures have caused a concern for listed species or designated critical habitats.

If you have any experience or insights on this issue, [please respond directly to Drew Crane in Headquarters by Wednesday, June 12](#). If this has been an issue for us in the past, we need to provide background information to Drew so that he will have a basis to discuss possible programmatic consultation with EPA at a National level.

Thanks for any assistance you can provide to Headquarters on this subject. Due to the short turnaround needed for response, please direct any questions or discussions directly to Drew Crane (see contact information below).

Thanks,
Janet Mizzi
Chief, Endangered Species Branch
Southeast Region

----- Forwarded message -----

From: **Crane, Drew** <drew_crane@fws.gov>

Date: Thu, May 30, 2013 at 6:59 PM

Subject: 316b Cooling Water Intake Structure Rule - Not an official assignment but input appreciated

To: Doug Laye <doug_laye@fws.gov>, Glenn Smith <glenn_s_smith@fws.gov>, Collette Thogerson <collette_thogerson@fws.gov>, Daniel Brown <daniel_brown@fws.gov>, Delfinia Montano <delfinia_montano@fws.gov>, Jana Affonso <jana_affonso@fws.gov>, Jennifer Szymanski <jennifer_szymanski@fws.gov>, Larry Salata <larry_salata@fws.gov>, Sonja Jahrsdoerfer <sonja_jahrsdoerfer@fws.gov>, Kenneth Graham <kenneth_graham@fws.gov>, Patrice Ashfield <patrice_ashfield@fws.gov>

Hi All,

As I mentioned on the call today, EPA will be finalizing a rule that will set standards for existing cooling water intake structures at various facilities that withdraw more than 2 million gallons of water/day (primarily power plants and manufacturing facilities). In the attached map, they have identified where these facilities may occur. They have also determined that these facilities overlap approximately 207 listed species ranges. In most cases, the states are the permitting authority for these facilities. That means in instances where take is occurring, the state or the facility would need to develop an HCP to address any ongoing take issues. This could result in a significant workload increase for some field offices. We are attempting to avoid that situation by addressing this issue through a national programmatic consultation with EPA.

Could each of you poll your respective field offices to see if:

- they know of facilities with cooling water intakes in their area that are impacting T&E species?
- have they completed any consultations or HCPs for facilities that have cooling water intake structures?
- they are aware that this many facilities overlap T&E species in their area?

Even "yes, no" answers would be helpful at this point. Field offices can respond directly to me or you can forward on any responses you receive. If possible, I would appreciate any information they can provide by the end of next week.

Thanks!

Drew Crane
Biologist, Branch of Consultation & HCPs
U.S. Fish and Wildlife Service

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