

From: [Alexander, Steven](#)
To: [Robert Alexander](#)
Cc: [shell.Karrie-Jo@epa.gov](#); [Vojin Janjic](#); [Wade Murphy](#); [Julie Harse](#); [Souraya Fathi](#); [Ariel Wessel-Fuss](#); [Elizabeth Rorie](#); [Debbie Arnwine](#); [Kim Laster](#); [Rob Todd](#)
Subject: Re: TDEC 316(b) Permit Reviews
Date: Tuesday, January 12, 2016 10:05:38 AM

Thanks Bob. For adequate FWS review for all 316(b) permits, it would be beneficial to have as much information related to water withdrawal appurtenances, withdrawal rates and velocities, cooling water balances, and modeling conducted by either the permittee or TDEC. We believe that a survey of the South Fork Holston for the Eastman permit is needed, since the last survey was conducted in 2010 which found good diversity with species utilizing similar habitats as the federally listed spotfin chub.

Steve

On Fri, Jan 8, 2016 at 11:45 AM, Robert Alexander <Robert.Alexander@tn.gov> wrote:

Steve,

Thanks for your time on the phone just now – I’m sending you this note just to remind myself of the points we covered – you can reply if I got it wrong.

Review process:

- To ensure you get all permit-related correspondence (appns & draft permits) for those CWIS sites – I’ve added you as a “government official” in Waterlog so you’ll automatically get it.
- I’ve confirmed you’re listed on the master contact list to get permit public notices – for all permits.
- Good to hear that you’re using Dataviewer and it’s working for you.
- For 316b sites involving T&E species, we are obligated to provide you the application, allow your 60-day review before public noticing the draft permit, and include the “no-take” language in all draft and final permits, etc.
- We only have 8 permits (other than TVA) that have T&E: Viskase, Cemex, Invista, Carlex, Kimberly-Clark, PCA, Dupont NJ, and Hood. I’m copying our other permit writers so we’ll all have the same understanding.
- As more data on these sites involving T&E become available, DWR will review them and seek your review and TWRA’s as well.
- There are 3 TVA sites:

- o Allen and New Johnsonville – we will likely never renew those permits prior to the fossil plants closing. We meet with TVA Tuesday and will know more after that.
- o Watts Bar Nuclear – just got the application last week – it's available on Dataviewer, but the appn doesn't discuss 316b. There's a separate TVA letter uploaded on 7 Dec describing their approach to submitting the data later – you say you're already familiar with this one from your work on the NRC licensing, so good.

Recent permit activities and details on the CWIS appurtenances:

AEDC TN0003751 - while not a permit application/renewal, AEDC sought our determination on requirements of 122(r) studies – we gave our BPJ Best Technology Available determination on the existing CWIS. All the details on the CWIS were appended to that letter of 5 Nov. We got an OK from TWRA and our Div. of Natural Heritage at that time. When AEDC's renewal application arrives in 2017, they'll include this BPJ BTA in it, I'm sure. It would be appropriate for FWS to comment during your 60-day review at that time, as you wish.

Kimberly-Clark TN0064653 – Being drafted now – their– so far I've planned to say the same BPJ-BTA since their operation is below the thresholds of 2 MGD/<25%. No details, but I'll ask.

Eastman TN0002640 – Also being drafted - application is at Dataviewer – currently SF Holston is no listed for T&E presence, but understand your concerns.

DuPont TN0002259 – Draft Permit was public noticed 30 Nov containing the BPJ-BTA language – April 15, 2015 application (on Dataviewer) has attachment on Cooling Water Balance - understand you are requesting more details on the intake due to lake sturgeon issues – I'll contact DuPont and ask for the info – they may not have compiled much of it but will find out.

We'll stay in touch.

Bob

Bob Alexander

NPDES Permit Writer

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We accept and encourage electronic document submittals.

From: Alexander, Steven [mailto:steven_alexander@fws.gov]
Sent: Monday, January 04, 2016 11:25 AM
To: Robert Alexander
Cc: shell.Karrie-Jo@epa.gov; Vojin Janjic
Subject: TDEC 316(b) Permit Reviews

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Bob -

Hope you had a good Christmas and New Years. I'm still sitting on the most recent 316(b) renewals submitted for review (i.e., Kimberly Clark, Tennessee Eastman, and Dupont) and contained within recent NPDES Public Notices issued by TDEC.

We have not received detailed information on the cooling water intake appurtenances (e.g. type/size/# of pumps, screen size/types, velocities). The same was true for the AEDC permit recently issued by TDEC. The FWS cannot process these nor provide any comments under the ESA until we have that information.

Steve

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