

Elizabeth Rorie

From: Julia Anastasio <janastasio@acwa-us.org>
Sent: Wednesday, March 27, 2019 9:45 AM
Cc: Sean Rolland
Subject: Member Question: Application of 316(b) Intake Requirements for Impingement and Entrainment

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ACWA 316(b) Workgroup:

Please see the question below from Missouri DNR. All responses should be sent directly to Pam Hackler at the address below.

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Good morning,

I have an agricultural teaching college which is required to maintain an NPDES permit for confined animal units, land application, pool discharge, cooling water discharge, and stormwater runoff. This facility also uses waters of the US to withdraw for cooling purposes...but for the purposes of cooling buildings. I've been reading the Federal Register Vol 79 No 158 8/15/2014 for the last two days attempting to determine if the EPA meant "manufacturing" in the literal sense when referring to facilities applicable to the rule. Also, did the EPA mean "cooling" to also mean any cooling? Including for buildings?

The facility meets all the obvious minimal requirements: 1) they withdraw >2MGD; 2) they withdraw from waters of the US; 3) they use >25% of the water withdrawn for cooling purposes; and 4) they are a point source required to maintain an NPDES permit.

Would your state apply the 316(b) intake requirements for impingement and entrainment at this college? Why or why not?

Please reply at: pam.hackler@dnr.mo.gov

Thanks,
Pam

Pam Hackler

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Check out ACWA's Workshop Schedule: <https://www.acwa-us.org/events/>