



September 30, 2016

Good afternoon. I am Joe Hossley, Environmental Manager at the Plum Point Energy Station located in Osceola, Arkansas. I would like to comment on the proposed revisions to APC&EC Regulation 6. The proposed revisions seek to adopt the federal rules for cooling water intake structures found in 40 CFR Part 125 Subparts I and J. Specifically, my comment concerns the elimination of entrainment monitoring.

Plum Point Energy Station strives for environmental excellence with a goal of 100% environmental compliance with local, state, and federal regulations. Plum Point Energy Station is a 665 MW coal fired power plant located three miles south of Osceola, Arkansas at 2732 S. County Road 623 in Mississippi County, Arkansas. The facility started operations in 2010. It is a pulverized coal unit designed to burn low-sulfur subbituminous Powder River Basin Coal. Plum Point Energy Station has a NPDES permit and withdraws water from the Mississippi River for use in its cooling tower.

Plum Point Energy Station has demonstrated full compliance with the federal cooling water intake structure regulation. Specifically, Plum Point Energy Station is in compliance with the maximum intake velocity (<0.5 ft/sec); total design intake flow <5% of the river; design technology to minimize impingement mortality; design technology to minimize entrainment; information submittal requirements; recordkeeping requirements; and implemented the entrainment monitoring under the rule.

The entrainment monitoring at Plum Point Energy Station has identified no adverse environmental impacts. Entrainment monitoring was performed in 2010, 2011, 2012, 2013, and 2015. Little annual variability was observed in the taxonomic composition and peak abundance of ichthyoplankton in the Mississippi River. Reviews of annual entrainment monitoring reports by the Arkansas Game and Fish Commission (AGFC) and the US Fish and Wildlife Service (FWS) identified no adverse environmental impacts due to entrainment losses.

Plum Point Energy Station recently requested discontinuance of entrainment monitoring under its NPDES Permit. The federal rule states that once the potential impact to threatened or endangered species has been determined, the regulations allow for the regulating authority to eliminate additional monitoring. The EPA currently has regulatory authority for the rule but it is administered through the ADEQ's NPDES program. The overlap in delegation of authority has been problematic in gaining relief from the entrainment monitoring requirement.

Plum Point Energy Station believes ADEQ should approve our request to eliminate future entrainment monitoring because we have identified no adverse environmental impacts due to entrainment losses. Plum Point Energy Station wants to express our concern that the adoption of the rule should include provisions that allow ADEQ to eliminate future entrainment monitoring where no adverse environmental impacts have

been demonstrated. The continuance of entrainment monitoring doesn't seem reasonable or appropriate in that situation.

Continued entrainment monitoring requires a facility to incur the high costs of repeated sampling studies year after year for little benefit. During the period 2010-2015, the total annual cost to perform entrainment monitoring was between \$100,000 and \$150,000 per year. According to 40 CFR §125.85(a)(2), we believe this compliance cost is "wholly out of proportion" to the EPA's estimated annual cost of \$36,000 (Year 2000 dollars) to conduct entrainment monitoring. We believe this amount is excessive for a facility that has demonstrated full compliance with Track I requirements for new facilities and has implemented the Best Technology Available for minimizing adverse impacts.

We request that ADEQ include provisions when adopting the rule that allow them to eliminate future entrainment monitoring based on no adverse environmental impacts. Plum Point Energy Station believes ADEQ should approve our request to eliminate future entrainment monitoring. We look forward to ADEQ gaining the regulatory authority to administer this program and exercising its discretion to eliminate future unnecessary entrainment monitoring where appropriate.

Thank you for your time.