

Comments from AEP on TCEQ Draft TCEQ document for Evaluation of Thermal Discharges (07/27/2017 version)

In conjunction with the Stakeholder's meeting held at TCEQ on July 27, 2017, AEP reviewed TCEQ's Draft document for Evaluation of Thermal Discharges. AEP hereby submits the following comments regarding the TCEQ Draft.

AEP recommends that TCEQ add the language pertaining to Industrial Cooling Water Impoundments that was contained in the Draft interim guidance document dated March 13, 2012 (in the paragraph entitled "Applicability") to the current version for Evaluation of Thermal Discharges. That language specifically says "Discharges into industrial cooling impoundments are exempt from numeric temperature criteria, however narrative criteria state that the temperature within industrial cooling lake impoundments and all other surface water in the State must be maintained so as to not interfere with the reasonable uses of such waters."

For these reasons, AEP also recommends that the same language be included in the actual implementation procedures document so as to clearly identify these bodies of water as being exempt from the development of numerical temperature criteria. This language could be included in the portions of the document where the initial screening procedures for the thermal evaluations are conducted.

In addition, in Attachment 1 of the Draft document for Evaluation of Thermal Discharges, AEP recommends adding the language "(e.g. Industrial Cooling Water Impoundments)" to the flow diagram box (Box #3) that contains the language "Temperature RP analysis not warranted" as an example of the type of water body that is not subject to the temperature screening. This will further describe/aid persons using the flow chart for purposes of understanding the intended applicability.

AEP recommends that TCEQ consider raising the "Ambient summer temperature" value listed in paragraph 3 on page 3 of the Thermal Evaluation Procedures document from 30.5 Degrees C to 32 degrees C. The value of 30.5 degrees C appears to be an average ("statistical analysis of summer temperatures" is the actual language used), however, for purposes of development of criteria for critical conditions, TCEQ should consider using the maximum value for temperature in cases where the critical flow values are also utilized. It is during these periods of critical low flows that the maximum temperatures are most often measured, therefore the use of average values for temperatures in these cases (although it may be conservative), may lead to the incorporation of an inappropriate "buffer" and then the resulting developed value may not accurately reflect the actual maximum conditions.

AEP recently experienced what can occur if an inappropriate value is used. AEP recently sought revision of a stream temperature criterion in the State of Arkansas (for the Little River in southern Arkansas) where the maximum stream temperature was shown to be more like the Gulf Coastal Region receiving waters located throughout the State of Texas. For this reason, the State of Arkansas raised the maximum criterion for the Little River from 30 degrees C to 32 degrees C (approved by both ADEQ and EPA). This State action was supported by both the propensity for the receiving stream to exceed that

value at least 10 percent of the time, and the ability of the quality of aquatic life to be sustained at that temperature. Since most of the receiving waters in the State of Texas are located south of the identified receiving stream in Arkansas, TCEQ should evaluate whether the corresponding temperature criteria assigned to receiving streams under critical conditions would similarly need to be at least 32 degrees C.

Thank you for your consideration of AEP's comments. If you have any questions concerning these suggestions or AEP's experience in Arkansas you can Frank Mills via e-mail at fmills@aep.com or by telephone at (214) 777-1507.