
From: Machin, James [mailto:JMachin@trcsolutions.com]
Sent: Thursday, October 19, 2017 4:41 PM
To: David Galindo <david.galindo@tceq.texas.gov>
Cc: Mark Rudolph <mark.rudolph@tceq.texas.gov>
Subject: comments on draft temperature screening procedures

David,
I offer these comments subsequent to the thermal discharge stakeholder meeting at TCEQ on October 16.

The example presented determined what would be considered the maximum effluent temperature as opposed to the daily average temperature in a permit. Effluent limitations are typically based on the daily averages to assure compliance with the WQ Standards. Daily max is higher. TDS is one example; average effluent limitations are calculated by the procedure.

Applying what could be an instantaneous effluent temperature reading to that situation does not seem appropriate. Temperature varies constantly, and it takes considerable time for the effluent to be fully mixed at the edge of the mixing zone. Over that time, a short-term spike would be moderated by the average temperature over the time period and would be unlikely to cause a WQS violation at the edge of the MZ. An average temperature is more appropriate for such a calculation.

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