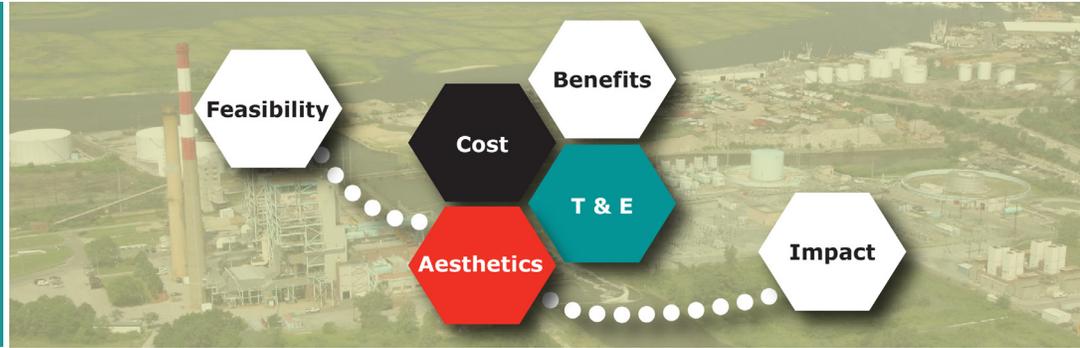


## Section 316(b) BTA Synthesis Reporting



The §316(b) Rule requires facilities with an actual intake flow of 125 MGD to submit a series of 4 reports that characterize entrainment, analyze intake alternatives (including closed cycle cooling) for feasibility, and describe the benefits (monetary and otherwise) and other environmental impacts of each alternative. The permit writer may also request this information for facilities with lower flows. Although the EPA requires these reports for entrainment BTA determination, it does not call for a synthesis of the information.

The complex biological, engineering and economic considerations that go into an entrainment BTA determination can be a lot for any individual permit writer to handle given all the other responsibilities that go into NPDES permitting. Hence, it could be beneficial to both the permit writer and the permittee if a synthesis, prepared by recognized experts, were available that could lead the permit writer through the entrainment BTA selection process following EPA criteria. Such a synthesis report could then provide documentation for the entrainment BTA selected.

### What ASA can do for you?

Using its **nationally-recognized** technical capabilities and expertise, **ASA** can work with facilities to provide a **comprehensive** yet **understandable** entrainment BTA synthesis report. This synthesis will put the most relevant information for the BTA selection before the permit writer and interested public by:

- Providing a summary of the key technical points from the 122.21(r)(9) through (12) reports;
- Comparing the incremental costs and incremental benefits of alternatives;
- Summarizing to T&E species information and the potential for the continued operation of the facility to jeopardize the recovery of each species;
- Stepping through EPA's entrainment BTA selection criteria; and,
- Making a concise and reasoned case for which alternative can most cost-effectively satisfy the requirements for entrainment BTA.

In many cases, we believe that a sound technical case can be made that no further modifications are necessary for individual facilities, a possible outcome recognized by EPA. **ASA** will carefully evaluate whether such an outcome is appropriate for your facility, and if it is, provide the rationale that the BTA criteria are already met. What is best for one facility may not be best for another. ASA recognizes that each plant has to be looked at on an individual basis to determine the most cost-effective BTA solution.



# Service Areas and Experience

## FEATURES

- Over 40 years of experience providing §316(b) compliance services.
- Senior staff are leading experts for the power and utility industry.
- Strategic compliance and research support to the Electric Power Research Institute (EPRI), power, utility and industrial clients on the §316(b) Rule.

## BENEFITS

- Extensive knowledge of facilities affected by the Rule and insight to frame tailored and successful compliance strategies.
- Access to the best-qualified staff serving the industry and organizations such as EPRI.
- In-house specialty capabilities to perform required monitoring, develop BTA controls, and reporting.
- Proactive, science-based solutions built in cooperation with our clients regardless of project or staff location.

## Oversight

- Directed consultants in diverse disciplines in preparing information for complex BTA decision-making processes.

## Synthesis

- Prepared analyses that summarize CWIS information such as species behavior, facility location, intake design and operation to help determine the most feasible BTA options.

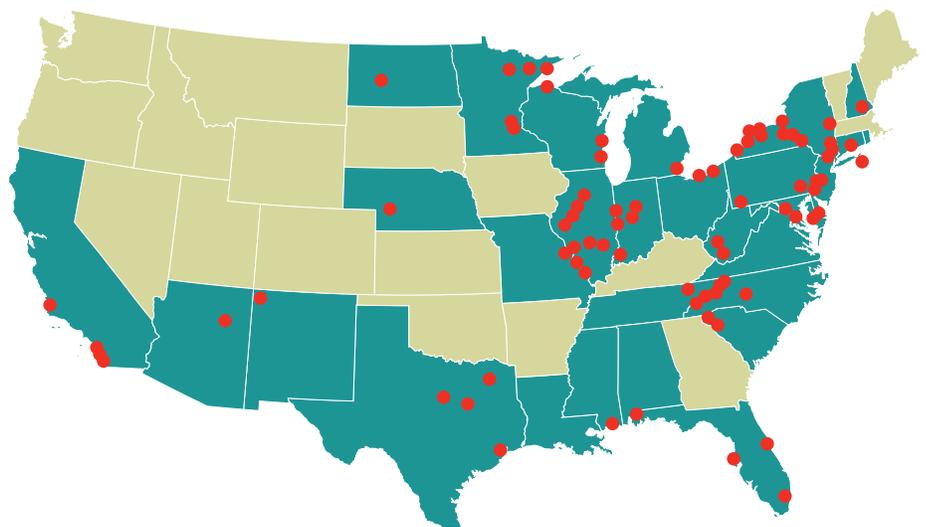
## Communication

- Conducted impingement and entrainment monitoring and related analyses at more than 30 facilities.

## Expert Consultation

- Prepared documents and presentations to explain BTA concepts and analyses to regulator agencies and the public.
- Provided expert testimony in several controversial BTA cases.

**ASA has delivered successful solutions for over 100 facilities throughout the United States**



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