# Martin Project, FERC No. 349 Draft Date: March 27, 2008

# Study Plan 2 - Location of NPDES Permits on Lake Martin

### 1.0 GOALS AND OBJECTIVES OF STUDY

The consulting agencies identified the following issues: declining water quality of Lake Martin, Calpine Power Plant impacts to Hillabee Creek, NPDES permits from Alexander City and the impact to Wind Creek and Lake Martin water quality, and an assessment of all NPDES permits that discharge into Lake Martin.

The purpose of this study is to develop a list of all NPDES permits on Lake Martin and identify their location. Once the permit list is compiled, it will be added to a Geographic Information System (GIS) overlay for use during the Martin relicensing.

## 2.0 RELEVANT RESOURCE MANAGEMENT GOALS

The Alabama Department of Environmental Management (ADEM) is responsible for maintaining high water quality levels on Lake Martin. This is an integral aspect of Lake Martin's success as a recreation, drinking water, fish and wildlife, and economic resource.

### 3.0 BACKGROUND AND EXISTING INFORMATION

In order to maintain high water quality, Federal and State laws regulate pollution from both point and non-point sources. Point sources are distinct conveyances. Examples include pipes and man-made ditches as well as discharges from municipal, industrial, and other facilities. Point source pollution sites within the Lake Martin reservoir are regulated through the National Point Discharge Elimination System (NPDES) managed by the ADEM and the United States Environmental Protection Agency (USEPA). NPDES permits include provisions such as limits on types of discharge, monitoring, and reporting requirements. An NPDES permit will usually indicate an acceptable pollutant parameter and the permittee may choose the best method to achieve these levels. The permits are issued for a five year term and may be renewed or administratively extended. The application process for the NPDES permits require that the public be notified and allowed to comment on NPDES permit application. The ADEM NPDES application requires information such as the purpose of the application, previous permit numbers, business activity, and waste storage and disposal.

Non-point source pollution is caused by precipitation moving across the ground and carrying pollutants such as pesticides and fertilizers with it. Several agencies including the Clean Water Partnership (CWP), the Soil Water Conservation Committee (SWCC), the Natural Resource Conservation Service (NRCS), and the Alabama Department of Public Health (ADPH) are concerned about monitoring discharges into Lake Martin and they have been working together (along with the APC) to determine the origin of non-point source pollution in the basin.

## 4.0 PROJECT NEXUS

There are both point and non-point sources of pollution that have direct and indirect impacts to Lake Martin.

### 5.0 STUDY AREA AND STUDY SITES

The study area will encompass Lake Martin, APC-owned lands within the Project Boundary, and significant point sources on specific tributaries as they pertain to point source discharges.

### 6.0 PROPOSED METHODOLOGY

The identification of NPDES permits on Lake Martin will be accomplished through the use of secondary data sources.

# 6.1 <u>Data Collection Techniques</u>

Existing information will be used to facilitate data collection for this study. First, a request for up to date NPDES data from the ADEM will be made.

Once a list of NPDES permit locations is complete and other existing literature has been complied and reviewed, a draft report will be issued to Martin Issue Group (MIG) 2 for their review and comment. The report will include a list of the NPDES locations, owners, and effluent limits. Comments received from MIG2 will be incorporated into a final report.

## 6.2 Data Analysis

Other than a literature review, there will be no data analysis associated with this study. The GIS overlays may be compared with areas of Lake Martin experiencing water quality problems to better understand the impacts of discharges.

### 7.0 CONSISTENCY WITH GENERALLY ACCEPTED SCIENTIFIC PRACTICE

The planned study methods discussed above are consistent with the methods followed in the Coosa and Warrior relicensing projects and have been accepted by the federal and state agencies and other interested stakeholders in those projects.

### 8.0 PRODUCTS

A draft report will be distributed to the MIG 2 for review and comment within 6 to 8 months of completion of the point source data collection. Analysis of the point source data will be used to determine the necessity of non-point source pollution data. A final report will be provided as part of the draft license application that will include raw data, GIS overlays, and training guidelines for non-point source pollution detection.

## 9.0 SCHEDULE

APC Files Final Study Plan November 2008 Anticipated FERC Approval April 2009 Draft Report July 2009

MIG-2 Review September 2009 Final Report January 2010

# 10.0 LEVEL OF EFFORT AND COST

APC estimates the cost of consulting of developing the study plan, collecting and reviewing existing information, and reporting is approximately \$25,000.

# 11.0 REFERENCES

Alabama Department of Environmental Management – National Pollution Discharge Elimination System <a href="http://www.adem.state.al.us/WaterDivision/WaterDivisionPP.htm">http://www.adem.state.al.us/WaterDivision/WaterDivisionPP.htm</a> accessed on 11-07-07.