Ledwin, Jane <jane_ledwin@fws.gov>

[EXTERNAL] RE: Labadie pallid collection

1 message

Hackler, Pam <pam.hackler@dnr.mo.gov> Wed, Jun 13, 2018 at 3:17 PM
To: "jane_ledwin@fws.gov" <jane_ledwin@fws.gov>
Cc: Jennifer Campbell <Jennifer.Campbell@mdc.mo.gov>, "Dunn, John" <Dunn.John@epa.gov>, "Abbott, Michael" <michael.abbott@dnr.mo.gov>

Good afternoon Jane,

The Department has determined it is the facility or facility's contractor's responsibility to coordinate with the Services on this matter. At the time of permit renewal when the studies are due to be submitted to the Department, the Department will evaluate the data obtained from the two ongoing studies for CWA §§ 316(a) and 316(b), and will, at that time, provide a permit decision for any thermal water quality issues and implement any impingement and entrainment BTA obligations under 40 CFR 122.21(r) *et seq* as required.

Thank you,

Pam

Pam Hackler

Pam Hackler, Environmental Scientist
Missouri Department of Natural Resources
Water Protection Program; Industrial Wastewater Unit; NPDES Permitting
Tel: 573-526-3386
Email:pam.hackler@dnr.mo.gov

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at https://www.surveymonkey.com/r/MoDNRsurvey. Thank you.

Please consider the environment before printing this e-mail.

From: Ledwin, Jane [mailto:jane_ledwin@fws.gov]
Sent: Wednesday, May 09, 2018 5:50 AM
To: dunn.john@epa.gov; pam.hackler@dnr.mo.gov
Cc: Herrington, Karen <karen_herrington@fws.gov>; Jason Goeckler <jason_goeckler@fws.gov>; Jennifer Campbell <Jennifer.Campbell@mdc.mo.gov>
Subject: Labadie pallid collection

Dear John -

Thank you for your April 13, 2018, email regarding the reported capture of a larval pallid sturgeon as part of the Labadie 316(a) studies by Ameren. This is a follow-up to my previous email from Ameren contractor, Amec Foster Wheeler Environmental & Infrastructure, Inc. that details their June 15, 2017 collection of a putative larval pallid sturgeon approximately 1 mile downstream of the plant. Although we cannot genetically confirm that the specimen was a pallid sturgeon, its collection does confirm that larval sturgeon are in the area of the Labadie plant. Based on that collection and the extent of the ongoing plant operations including thermal discharges, we believe take of pallid sturgeon may be occurring. To better understand the extent of this, we recommend the following:

1.) Modify the study protocols so any remaining larval samples would be preserved in 95% NON-denatured ethanol or desiccant (i.e., pure of 200 proof) to allow genetic analysis of the sample.

2.) Provide the Service the results of ongoing riverine sampling studies for this facility for all species to understand site specific data available to better characterize the riverine biological community.

3.) Provide data and modeling results to help us better understand the extent, duration, and temperature profile of the thermal discharges at various seasonal flows, including low flows.

Based on that information (above),we can determine if we would recommend additional riverine sampling to characterize the zone affected by thermal discharges. We would be happy to arrange a meeting or conference call to discuss in more detail to address these needs and better understand how this may fit in the permitting process.

Thanks for your continued engagement -

Jane

Jane Ledwin
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
101 Park DeVille Drive
Columbia, Missouri 65203
Phone 573/234-2132, extension 109

cell 573/356-1721
email jane_ledwin@fws.gov

Ledwin, Jane <jane_ledwin@fws.gov>

[EXTERNAL] RE: Reporting on Collection of Potential Pallid Sturgeon

1 message

Dunn, John <Dunn.John@epa.gov> Fri, Apr 13, 2018 at 1:51 PM
To: "Ledwin, Jane" <jane_ledwin@fws.gov>, "pam.hackler@dnr.mo.gov" <pam.hackler@dnr.mo.gov>
Cc: "Herrington, Karen" <karen_herrington@fws.gov>

Jane,

We are putting together annual reports for the Services. Should we consider this a "take" and add it to the national report?

Thanks. --JD

From: Ledwin, Jane [mailto:jane_ledwin@fws.gov]
Sent: Friday, April 13, 2018 11:22 AM
To: pam.hackler@dnr.mo.gov; Dunn, John <Dunn.John@epa.gov>
Cc: Herrington, Karen <karen_herrington@fws.gov>
Subject: Fwd: Reporting on Collection of Potential Pallid Sturgeon

Hi John -

Thanks for the heads-up on the upcoming permit for biosolids recycling in Pacific, MO.

As I mentioned on the phone, below is the notification from the Conractor for Ameren that their sampling at Labadie collected a putative larval pallid sturgeon. While the expert who identified it is the recognized expert, unfortunately the sampling methods did not allow for genetic analysis. I have spoken with the contractor to better understand the sampling events and the Service is considering the best path forward at this point. You mentioned that the plant just updated their NPDES permit/ thermal discharge (?) requirements.which I was not aware of. My last email traffic with Pam from March of last year left me with the impression that the permit renewal was some years away. Perhaps I have this mixed up.

Sorry for the tardy communication on my part. I erroneously assumed that the company had shared with information with MDNR and EPA.

Pam - could you please confirm the status of the Labadie permit(s) and their data collection?

Thanks and have a great weekend!

Jane

Jane Ledwin
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cell 573/356-1721
email jane_ledwin@fws.gov

---------- Forwarded message ----------
From: **Elzinga, William J** <william.elzinga@woodplc.com>
Date: Fri, Feb 9, 2018 at 10:56 AM
Subject: Reporting on Collection of Potential Pallid Sturgeon
To: "jacob.faulkner@dnr.mo.gov" <jacob.faulkner@dnr.mo.gov>, "jane_ledwin@fws.gov" <jane_ledwin@fws.gov>, "Julie.Love@mdc.mo.gov" <Julie.Love@mdc.mo.gov>
Cc: "Giesmann, Craig J" <CGiesmann@ameren.com>, "Smallwood, Michael J" <MSmallwood@ameren.com>, "Kenny Lynn (klynn@ameren.com)" <klynn@ameren.com>, "Baker, Justin" <justin.baker@woodplc.com>, "Basler, Matthew C" <matthew.c.basler@woodplc.com>

Amec Foster Wheeler Environment & Infrastructure, Inc. (AmecFW) has been retained to conduct aquatic ecological studies in the vicinity of Ameren Missouri's Labadie Power Plant (Labadie) in conjunction with a study plan developed and approved by the Missouri DNR in accordance with Labadie's NPDES permit. In support of these studies AmecFW had obtained scientific collector's permits from the Missouri Department of Conservation in accordance with Section 3CSR10-9.425 of the Missouri Wildlife Code. As part of routine scheduled monthly sampling programs, a larval sturgeon specimen was collected in the vicinity of Labadie. The larval specimen was captured on June 15th from a sampling location downstream from the plant; approximately 1 mile downstream of the discharge. The specimen was retained and preserved along with other post larval and juvenile specimens of other fishes and transported to AmecFW's laboratory for analysis. Earlier this month, in subsequent processing of the samples AmecFW identified a larval sturgeon measuring 27.3 mm TL that was preliminarily identified as a river sturgeon (*Scaphirhynchus* spp.). The larval specimen was sent to an outside recognized taxonomic expert for verification and determination of the identification to species. After consideration of diagnostic morphological characters in Snyder (2002), the specimen was identified by Dr. Darrel Snyder with "reasonable confidence" as a pallid sturgeon (*Scaphirhynchus albus*). We are advising FWS and other State agencies out of an abundance of caution. Under the current sampling plan approved by MDNR and in accordance with MDC scientific collectors permits, sampling will continue on a monthly basis and terminate later this year.

We are happy to discuss the matter further at your convenience, as appropriate.

Regards,

Bill

Project Manager

William Elzinga
Sr. Associate Scientist
Environment & Infrastructure Solutions

314.520.1506 (cell)
636.200.5119 (office)

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Ledwin, Jane <jane_ledwin@fws.gov>

[EXTERNAL] RE: Reporting on Collection of Potential Pallid Sturgeon

1 message

Hackler, Pam <pam.hackler@dnr.mo.gov> Fri, Apr 13, 2018 at 11:39 AM
To: "Ledwin, Jane" <jane_ledwin@fws.gov>, "Dunn.John@epa.gov" <Dunn.John@epa.gov>
Cc: "Herrington, Karen" <karen_herrington@fws.gov>

Good morning Jane,

The Labadie permit was issued on August 1, 2015. Was there another permit we were discussing? There have been modifications to the Labadie permit since then. You may view the current permit at https://dnr.mo.gov/env/wpp/permits/issued/docs/0004812.pdf

-Pam

Pam Hackler

Pam Hackler, Environmental Scientist
Missouri Department of Natural Resources
Water Protection Program; Industrial Wastewater Unit; NPDES Permitting
Tel: 573-526-3386
Email:pam.hackler@dnr.mo.gov

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Cc: Herrington, Karen
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email jane_ledwin@fws.gov

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Date: Fri, Feb 9, 2018 at 10:56 AM
Subject: Reporting on Collection of Potential Pallid Sturgeon
To: "jacob.faulkner@dnr.mo.gov" <jacob.faulkner@dnr.mo.gov>, "jane_ledwin@fws.gov" <jane_ledwin@fws.gov>, "Julie.Love@mdc.mo.gov" <Julie.Love@mdc.mo.gov>
Cc: "Giesmann, Craig J" <CGiesmann@ameren.com>, "Smallwood, Michael J" <MSmallwood@ameren.com>, "Kenny Lynn (klynn@ameren.com)" <klynn@ameren.com>, "Baker, Justin" <justin.baker@woodplc.com>, "Basler, Matthew C" <matthew.c.basler@woodplc.com>

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