

FILED JL FIN
Cooling
Tower

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July 6, 1977

Morton Goldfein, Esquire
Deputy Attorney General - Chief
Department of Law and Public Safety
35 West State Street
Trenton, New Jersey 08625

Dear Mort:

This will confirm our telephone conversation last Friday about the options available to the DEP and GPU to resolve problems concerning the applicability of Subchapters 6 and 8 of the Rules of the Bureau of Air Pollution Control to the construction and operation of the cooling tower at JCP&L's Forked River Nuclear Generating Station.


During our conversation, I mentioned that GPU and JCP&L plan to employ state-of-the-art drift elimination technology for controlling natural salt water emissions from the operation of the tower. Assuming a drift rate of .002% -- which is much less than the 99% collection efficiency requirement of Section 6.2 of Subchapter 6 -- the tower will emit approximately 300 pounds per hour of sea salt because of the salinity of the make-up water and cycles of concentration to be achieved in the cooling tower basin. Consequently, as indicated in GPU's March 1, 1977 letter to Ed Londress, salt water emissions from the tower would comply with all requirements of Subchapter 6, except for the maximum allowable emission rate of 30 pounds per hour. Based on this, GPU had recommended to the DEP that the optimum solution to the problem of compliance with Subchapter 6 would be to amend the emission limitation requirements of Section 6.2 to reflect the unique character of emissions from salt water cooling towers. The reasons for an amendment, instead of the issuance of a variance, are set out in GPU's letters to Ed Londress and Dr. Paulson.

Morton Goldfein, Esquire
July 6, 1977
Page Two

In any event, I asked whether you would schedule a meeting among legal and technical representatives of the DEP and GPU. At the meeting, GPU would be prepared to address technological and environmental questions you and representatives of the DEP may have about the operation of the tower. At that time, we also would have an opportunity to discuss the legal implications of implementing GPU's recommendation to amend Subchapter 6.

I look forward to hearing from you about a date for the meeting.

Very truly yours,


John P. Proctor

JPP:cm

cc: R. C. Arnold
J. Callen, Esq.
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