CLEAN WATER ACT §316(B) PEER REVIEWER

With many regulated facilities completing their §122.21(r) environmental studies, the need for qualified, effective peer reviewers under §122.21(r)(13) is pressing. Mr. Eric Miller, MS of Miller Marine Science & Consulting, Inc. represents a unique peer reviewer for the biological studies and their incorporation in §122.21(r)(11) – Benefits Valuation Study.

HOW CAN MILLER MARINE SCIENCE & CONSULTING, INC. HELP YOU, AND YOUR CLIENT COMPLY WITH §122.21(R)(13)?

Eric Miller, Principle and founder of Miller Marine Science & Consulting, Inc., has 14 years of consulting experience supporting once-through-cooled power plants comply with their National Pollutant Discharge Elimination Permits, including ongoing impingement monitoring to document the annual loss of aquatic life reported to the permitting authority. These yearly impingement monitoring programs were periodically supplemented by rigorous studies requiring more frequent surveys, diel coverage, and an extensive array of data collection, e.g., physical condition (dead, alive, decomposed). Mr. Miller managed these studies and led the data analysis in southern California. Recently, he was a technical expert assisting with the analysis for facilities across the United States.

Mr. Miller assisted with entrainment studies at facilities across southern California. Entrainment studies occurred less frequently than impingement monitoring, but with greater complexity. Mr. Miller assisted with the entrainment study design, execution, and reviewed the analyses and conclusions. He performed a similar technical expert role assisting with entrainment study analysis at the national level.

The §316(b) impingement and entrainment studies Mr. Miller worked on included the initial characterization study and subsequent reviews of technologies to reduce impingement and entrainment mortality. In collaboration with technology experts, Mr. Miller reviewed the applicability and likely performance of each technology to determine what was feasible and the possible benefit to result from the installation of each candidate technology.

Mr. Miller combines an intimate knowledge of cooling water system operations, ecological knowledge, a wide breadth of fish life history knowledge, the mechanics of the conventional analytical models such as adult equivalent loss and production foregone. This rare combination of experience and knowledge will help provide §316(b) clients with unparalleled peer-review expertise.