Permits and TMDL Branch Action Items Week of May 15-19, 2017

Meetings and Events

Career Day Event

- **Type of Event:** Career Day at Fort Worth ISD
- **Date/Place of the Event**: May 24, 2017- East Handley Elementary School, Ft Worth
- **Description of the event**: EPA staff has been invited to attend career event at this elementary school. Participants will talk to kids on what type of jobs they could look forward to as scientists and engineers in the environmental field.
- **Participants**: Silvia Bogdan, 6WQ-PO, other EPA staff.

Future Permittee Requested Meeting

- **Type of Event: Meeting with Permittee at Operator's request Date/Place of the Event:** Region 6 Offices, May 18, 2017, 2:00 pm
- **Description of the event/subject matter:** Freeport LNG requested to meet with EPA Region 6 Water Programs for a routine annual discussion on their programs.
- **EPA Participants involved in the event:** Staff form NPDES Permitting Section, Regional Counsel, Energy Policy Advisor
- **Approximate Number of people in attendance:** 6-8 total from Freeport LNG and R6

Permittee Requested Meeting

- **Type of Event: Meeting with Permittee at Permittee's request** BP requested to meet with EPA Region 6 Water Programs for a routine annual discussion on their programs.
- **Date/Place of the Event:** Region 6 Offices, May 17, 2017, 10:00 am
- **Description of the event/subject matter:** Meeting with BP Exploration & Production Inc.- BP requested to have annual meetings with EPA 6 to review their water programs.
- **EPA Participants involved in the event:** 6WQ-P and 6EN-W staff
- **Approximate Number of people in attendance:** 8-12 total from BP and R6

Upcoming Meeting/Program Review

- **Type of Event:** Preliminary discussions with Louisiana Department of Environmental Quality (LDEQ) to set up the FY17 National Pollutant Discharge Elimination System (NPDES) Program - Permit Quality Review (PQR) – (EPA R6 FY17 commitment)
- **Date/Place of the Event:** Need to contact and coordinate with LDEQ **ASAP** regarding the proposed review dates. (EPA has significant preparation work prior to this review.) We will propose that the PQR occur mid-June 2017/@ LDEQ offices

- **Description of the event/subject matter:** PQRs assess whether a state adequately implements the requirements of the NPDES program as reflected in the permit and other supporting documents. PQRs are intended to promote national consistency, identify successes in implementing the NPDES program, and establishes opportunities for improvement in developing NPDES permits and can be helpful in identifying areas for training or guidance.
- **EPA Participants involved in the event:** R6WQ-PO staff, and possibly EPA HQs OWM-WPD staff/contractor support
- **Approximate Number of people in attendance:** R6WQ-PO (1 or 2) and EPA HQs/contractor (1 or 2)

Action items

Louisiana Offshore Oil Port (LOOP), LLC, Deepwater Port Complex, (joint venture of Marathon Pipe Line LLC, Valero Terminal and Distribution Company, and Shell Oil Company) (LPDES Permit No. LA0049492, AI No. 4634) - State Permit Review and EPA Permit Issuance AND Call with LDEQ

The existing wastewater permit which was jointly issued by EPA & LDEQ expired September 30, 2013. EPA and LDEQ are continuing to work together on the proposed reissuance of the permit regarding appropriate permit requirements for brine discharges. This situation is similar to the Strategic Petroleum Reserves (SPR) under the U.S. Department of Energy, (Big Hill Oil Storage, TX0092827, and Bryan Mound Oil Storage, TX0074012).EPA reissued these permits in November 2014. An EPA and LDEQ conference call is planned for May 18, 2017, to discuss LDEQ's proposal regarding a possible alternate approach for the brine discharge permit requirements. The joint LDEQ/EPA permit will be reissued ASAP. R6 upper management briefings are planned to begin in late-May 2017.

City of Westwego, Wastewater Treatment Plant (LPDES Permit No. LA0038059, AI No. 4857) - State Permit Review

This facility is a 3 MGD "major" Publicly Owned Treatment Works (POTW) which does not appear to have controversial issues. Upon further review of the proposed permit, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible, but no later than May 19, 2017.

Carville Energy, LLC, Carville Energy Center (LPDES Permit No. LA0110604, AI No. 51854) - State Permit Review

This facility generates both steam and electricity for neighboring facilities in the St. Gabriel area and sends treated wastewater to a neighboring discharge pipe. Additional information may be needed to ensure the clarity and enforceability of the proposed permit. Upon further review of the proposed permit, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible, but no later than May 25, 2017.

Formosa Plastics Corporation, Louisiana (Baton Rouge, LA), (LPDES Permit No. LA0006149, AI No.288) - State Permit Review
This facility manufactures organic chemicals and is proposing to increase its production. Upon further review of the proposed permit, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible, but no later than May 31, 2017.

CITGO Petroleum Corporations, Lake Charles Manufacturing Complex (Westlake, LA) (LPDES Permit No. LA0005941, AI No. 1250) - State Permit Review
This facility is comprised of three units: the Main Refinery, the Propylene Fractionation Unit, and the Lubricants and Wax Plant. Upon further review of the proposed permit, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible, but no later than May 31, 2017.

Denka Performance Elastomer LLC, Pontchartrain Plant (LaPlace, LA) (LPDES Permit No. LA0127190, AI No.193310) - State Permit Review
Denka is a new owner of a portion of this existing synthetic rubber manufacturer with neoprene and chloroprene manufacturing units. (DuPont retained a portion of the facility under its existing permit, LA0005924, AI No. 38806). EPA and LDEQ have ongoing air-related efforts at this facility. Upon further review of the proposed permit, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible, but no later than May 31, 2017.

Oklahoma Gas & Electric Company (OK0034657, ID # I-51001260) – State Permit Review
This facility consists of three 550 megawatt coal-fired steam electric power generating units, which does not appear to have controversial issues. Upon further review of the proposed permit, EPA will determine the appropriate response for issuance to ODEQ no later than May 18, 2017.

Offer for Tribal Consultation on Reissuance of NPDES Permit for Espanola, NM, DD Letters offering Tribal Consultation
By May 19, 2017, the Water Division will be sending letters offering to consult on reissuance of the Espanola WWTP to the Pueblos of San Ildefonso and Santa Clara.

City of Dallas (MS4) Interim Objection Letter (TPDES Permit No. WQ0004396000, EPA No. TXS000701), State Permit Review This draft permit was reviewed by EPA storm water team and an Interim Objection Letter will be sent to the State by May 19, 2017. This facility discharges to 303(d) waters and also discharges to a waterbody segment which has a finalized TMDL..

City of Rockport (TPDES Permit No. WQ0010054001, EPA No. TX0022152), State Permit Review This draft permit has only been preliminarily reviewed. The following was found: Renewal w/o Changes (admin changes), No discharge to 303(d) waters (Segment No. 2471), No TMDL, No WET RP (zero failures over last 3 years), Priority Watershed of Critical Concern (Whooping Crane, endangered) No variance request, No pH screening needed, No TDS, Cl or SO_4 screening needed, No Compliance Schedule, and A portion of discharge is allowed to be discharged via irrigation to a 200 acre Golf Course (see OTHER REQUIREMENT NO. 7).

Worst case scenario, this draft permit will be submitted as an Interim Objection, by its regulatory deadline of Thursday, May 25, 2017.

City of Athens (TPDES Permit No. WQ0010143003, EPA No. TX0025364), State Permit Review This draft permit has only been preliminarily reviewed. The following was found: Renewal w/o Changes (admin changes), Discharges to 303(d) waters (Dioxin & PCBs in edible tissue – 0804), No TMDL, No WET RP (zero failures over the last 3 years), No variance request, No pH screening needed, No TDS, Cl or SO_4 screening needed, and No Compliance Schedule. Worst case scenario, this draft permit will be submitted as an Interim Objection, by its regulatory deadline of Thursday, May 25, 2017.

Williamsburg Regional Sewage Authority (TPDES Permit No. WQ0011598001, EPA No. TX0058408), State Permit Review This draft permit has only been preliminarily reviewed. The following was found: Renewal w/o Changes (admin changes), No Discharge to 303(d) waters, TMDLs *(Project No. 1: 14 TMDL for Nickel in the Houston Ship Channel System; Project No. 22: 18 TMDL for Bacteria in Buffalo & Whiteoak bayous and Tributaries Segments 1013, A, C, 1014, A-B, E, H, K-M, O, 1017, A-B, D-E*), No WET RP (zero failures over the last 3 years), No variance request, No pH screening needed, TDS, Cl & SO_4 screening needed, and No Compliance Schedule. Worst case scenario, this draft permit will be submitted as an Interim Objection, by its regulatory deadline of Thursday, May 25, 2017.

Harris County Municipal Utility District No. 170 (TPDES Permit No. WQ0012121001, EPA No. TX0079146), State Permit Review This draft permit has only been preliminarily reviewed. The following was found: Renewal WITH Changes (Admin Changes, MAL for T. Silver revised from 0.002 mg/L to 0.005 in draft permit), No Discharge to 303(d) waters, TMDLs (*Project No. 1: 14 TMDL for Nickel in the Houston Ship Channel System; Project No. 22: 18 TMDL for Bacteria in Buffalo & Whiteoak bayous and Tributaries Segments 1013, A, C, 1014, A-B, E, H, K-M, O, 1017, A-B, D-E*), Bacteria limited to 63 CFUs, No WET RP (zero failures over last 3 years), No variance request, pH screening, TDS, Cl & SO_4 screening needed, and No Compliance Schedule. Worst case scenario, this draft permit will be submitted as an Interim Objection, by its regulatory deadline of Thursday, May 25, 2017.

North Texas Municipal Utility District (TPDES Permit No. WQ0012446001, EPA No. TX0088633), State Permit Review This draft permit has only been preliminarily reviewed. The following was found: Renewal w/o Changes (Admin Changes & WET testing end point changed from NOEC to IC25 (S.Bogdan was consulted, no issues or concerns), No Discharge to 303(d) waters, No TMDL, No WET RP (zero failures over last 3 years), No variance request, pH screening, TDS, Cl and SO_4 screening required, and the Fact Sheet states "The plant has a 3rd, wet-weather train…" Need clarification on what "biological contact basins" are to confirm there is no bypass of secondary treatment. Worst case scenario, this draft permit will be submitted as an Interim Objection, by its regulatory deadline of Thursday, May 25, 2017.

Announcement of Public Hearings for Proposed Outer Continental Shelf Oil and Gas General Permit – Public Notice of Proposed Permit and Public Hearings
By May 16, 2017, the Water Division will be publishing newspaper notices in the Houston and New Orleans papers regarding the May 11, 2017 Federal Register Notice announcing the

proposed reissuance of the NPDES permit for the general permit covering oil and gas exploration and production activities in the central and western Gulf of Mexico. These Notices will also announce two public meetings and hearings to be held the week of June 18th in the Houston and New Orleans areas.