To: Schwab, Kay[Schwab.Kay@epa.gov]; Chen, Isaac[Chen.Isaac@epa.gov]
Cc: Bogdan, Silvia[bogdan.silvia@epa.gov]; Larsen, Brent[Larsen.Brent@epa.gov]; Baskin, Kilty[Baskin.Kilty@epa.gov]; Shaikh, Taimur[Shaikh.Taimur@epa.gov]; Hamilton, Denise[Hamilton.Denise@epa.gov]; Dwyer, Stacey[Dwyer.Stacey@epa.gov]
From: Schaub, Mike
Sent: Fri 2/9/2018 7:59:06 PM
Subject: RE: LOOP LLC, Deepwater Port Complex (PER20130001, LA0049492, AI 4634)
2016 IR Rationale FINAL 2-25-16.docx

Normally, my answer would be 'no' because these sources are often based on field observations of the survey crews and their general knowledge about the area in which waters are monitored. However, in the case of the Barataria coastal subsegment (as well as the MS River coastal subsegment), LDEQ has provided evidence of a significant halocline, or increase in salinity, with depth (as well as a pycnocline) along with a corresponding decrease in DO, all set up by the MS River discharge. Now while I think this may be a factor, the large nutrient load also has a well-documented and significant impact as well, but the former observation likely forms the basis for LDEQ's listing of the suspected source as 'natural' in origin. They're presently working on a technical support document to support the eventual revision of DO criteria for the Terrebonne/Barataria/MS River coastal subsegments. I attended a conf call about it just yesterday. I can certainly see Silvia's argument regarding brine discharges in this case if LDEQ's primary argument regarding the effects of a halocline holds true.

I've attached a document with LDEQ's summary of its Gulf DO study. The write-up starts on page 19. Some nice graphical displays toward the end that illustrate their observations.

Mike Schaub

Environmental Scientist

Assessment, Listing and TMDL Section

USEPA Region 6

214-665-7314

From: Schwab, Kay
Sent: Friday, February 09, 2018 12:52 PM
To: Chen, Isaac <Chen.Isaac@epa.gov>; Schaub, Mike <Schaub.Mike@epa.gov>
Cc: Bogdan, Silvia <bogdan.silvia@epa.gov>; Larsen, Brent <Larsen.Brent@epa.gov>; Baskin, Kilty <Baskin.Kilty@epa.gov>; Shaikh, Taimur <Shaikh.Taimur@epa.gov>; Hamilton, Denise <Hamilton.Denise@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>

Subject: RE: LOOP LLC, Deepwater Port Complex (PER20130001, LA0049492, AI 4634)

Hi Isaac & Mike,

Please see Silvia's concerns below. I have attached an excerpt of the 2016IR for Subsegment 021102 (…Gulf Waters) for your convenience. Mike, does the stated "suspected source" carry much weight in this report?

Thanks

K

From: Bogdan, Silvia
Sent: Friday, February 09, 2018 11:25 AM
To: Schwab, Kay <Schwab.Kay@epa.gov>; Chen, Isaac <Chen.Isaac@epa.gov>
Subject: RE: LOOP LLC, Deepwater Port Complex (PER20130001, LA0049492, AI 4634)

Hi Kay, I reviewed the fs/permit. On Page 21 of the fact sheet, the suspected source for the DO impairment is listed as "due to natural conditions". I am not sure whether this was the actual language in the integrated report, if it's not then they may not want to list the suspected source as "natural" as we would be discarding a possible side-effect from a primary source such as a high salt loading. The old environmental monitoring reports that LOOP submitted also cited low DO in the area as "natural", and we have asked that they analyze the effects on DO that their saline discharge is having. The fact sheet states that the facility needs pre-approval by LDEQ prior to using oxygen scavengers or corrosion inhibitors but it does not mention that an overload of salt also has the potential to decrease DO. Monitoring for DO for 004 is established when an oxygen scavenger or corrosion inhibitor is used, not when they are discharging brine (footnote #4 in the table in the permit- pg.4).

I have no other comments.

Thanks,

Silvia

From: Schwab, Kay
Sent: Tuesday, January 30, 2018 2:36 PM
To: Shaikh, Taimur <Shaikh.Taimur@epa.gov>
Cc: Chen, Isaac <Chen.Isaac@epa.gov>; Bogdan, Silvia <bogdan.silvia@epa.gov>; Larsen, Brent <Larsen.Brent@epa.gov>; Rymer, Edwina <Rymer.Edwina@epa.gov>
Subject: FW: LOOP LLC, Deepwater Port Complex (PER20130001, LA0049492, AI 4634)

Hi Taim,

You mentioned that Stacey has provided additional feedback to you. Please provide information as appropriate to Isaac/Brent and Silvia regarding timeframe, etc.

Typically this type of resubmittal (after > 3 years) provides a 30-day review period, but not sure if other discussions have set a different path??

Thanks

K

From: Sonja Loyd [mailto:Sonja.Loyd@LA.GOV]
Sent: Tuesday, January 30, 2018 2:01 PM
To: Rosborough, Evelyn <rosborough.evelyn@epa.gov>
Cc: Scott Guilliams <Scott.Guilliams@LA.GOV>; Jenniffer Sheppard <Jenniffer.Sheppard@LA.GOV>; Michelle Bickham <Michelle.Bickham@LA.GOV>; Brian Tusa <Brian.Tusa@LA.GOV>; Shaikh, Taimur <Shaikh.Taimur@epa.gov>; Schwab, Kay <Schwab.Kay@epa.gov>; Chen, Isaac <Chen.Isaac@epa.gov>
Subject: LOOP LLC, Deepwater Port Complex (PER20130001, LA0049492, AI 4634)

Hello Evelyn,

The attached revised preliminary draft permit package is being submitted in accordance with the terms of the Memorandum of Agreement (MOA) between the Louisiana Department of Environmental Quality and the U.S. Environmental Protection Agency, Region 6.

PERMIT NUMER	FACILITY
LA0049492	LOOP LLC, Deepwater Port Complex

Please note the received date of this package and forward via electronic mail to Sonja Loyd at sonja.loyd@la.gov to acknowledge the receipt of this revised preliminary draft permit package. In accordance with the MOA, the Agency has thirty (30) days to submit comments regarding the revised preliminary draft permit package. Please send official comments to Elliott B. Vega, Assistant Secretary, at the following address:

Elliott B. Vega, Assistant Secretary
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

It would be appreciated if you could also send a copy of the comments to me. If you have any questions regarding the attachments, please contact me at (225) 219-3232 or Jenniffer Sheppard at (225) 219-3197. All future correspondence regarding this permit shall use the Agency Interest (AI) number 4634 and the LPDES permit number LA00494926.

Sonja Loyd

[Note: All updates made to the revised preliminary draft permit package are highlighted in red.]

Renewal Application and Additional Information Received:

2013 Initial Application -
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=8776163&ob=yes

August 29, 2013 E-mail Correspondence –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=8977644&ob=yes&child=yes

March 18, 2014 E-mail Correspondences (2 e-mails) –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361320&ob=yes&child=yes and
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361316&ob=yes&child=yes

April 14, 2014 E-mail Correspondence -
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361374&ob=yes&child=yes

April 23, 2014 E-mail Correspondences (2 e-mails) –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361324&ob=yes&child=yes and
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361322&ob=yes&child=yes

April 25, 2014 E-mail Correspondence –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361326&ob=yes&child=yes

May 19, 2014 E-mail Correspondence -
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361336&ob=yes&child=yes

May 21, 2014 E-mail Correspondences (2 e-mails) –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9361330&ob=yes&child=yes and
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9360826&ob=yes&child=yes

July 3, 2014 Letter -
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9378933&ob=yes&child=yes

November 17, 2014 E-mail Correspondence –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=10952293&ob=yes&child=yes

August 10, 2015 Letter -
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=9882515&ob=yes&child=yes

February 2, 2016 E-mail Correspondence -
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=10113710&ob=yes&child=yes

February 5, 2016 E-mail Correspondence –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=10920729&ob=yes&child=yes

August 1, 2016 E-mail Correspondence –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=10303902&ob=yes&child=yes

December 19, 2017 E-mail Correspondence –
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=10926098&ob=yes&child=yes

December 19, 2017 Letter -
http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=10924839&ob=yes&child=yes