To: Honker, William[honker.william@epa.gov]
Cc: Garcia, David[Garcia.David@epa.gov]; Hayes, Mark[hayes.mark@epa.gov]; Schwab, Kay[Schwab.Kay@epa.gov]; Bogdan, Silvia[bogdan.silvia@epa.gov]
From: Dwyer, Stacey
Sent: Wed 6/14/2017 2:07:41 PM
Subject: Status of LOOP

BACKGROUND: LOOP's discharge requires a joint EPA/LDEQ issued NPDES/LPDES permit. The Permit expired 9/30/2013. EPA concurred on the draft permit in July 2014, which included biomonitoring requirements at Outfall 004; however, LOOP opposed

the biomonitoring requirements. EPA has been working with LDEQ to find a mutually agreeable approach to assess whole effluent toxicity (WET).

ENVIRONMENTAL/PUBLIC HEALTH CONCERNS: Outfall 004 discharges an excess of TDS into Subsegment 021102, Barataria Basin Coastal Bays and Gulf Waters to the State 3-mile limit, which is listed in the Final 2016 Integrated Report of Water Quality

in Louisiana as not supporting fish and wildlife propagation, FWP, (fishing), one of its designated uses. Subsegment 021102 does not have a site-specific water quality standard for TDS, however, an excess of TDS is toxic to aquatic life.

REGULATORY REQUIREMENTS: 40 CFR 122.44(d)(1)(v): Limits for WET are necessary where reasonable potential exists, unless a chemical specific limit is adequate to control toxicity.

CURRENT STATUS: Upon request from LDEQ in a call on May 28, 2017, EPA forwarded a copy of a WET lab report from Big Hills Strategic Petroleum Reserve (SPR), and the final conclusions from the SPR's MSTR study to LDEQ, so they and LOOP could review.

LDEQ sent the WET info to LOOP/consultant, but has not heard back as of June 12, 2017.