To: Larsen, Brent[Larsen.Brent@epa.gov]; Crawford, Brad[crawford.brad@epa.gov]
Cc: Wooster, Richard[Wooster.Richard@epa.gov]; Ryland, Renea[Ryland.Renea@epa.gov]; Hudiburgh, Gary[Hudiburgh.Gary@epa.gov]; Chen, Isaac[Chen.Isaac@epa.gov]; Bogdan, Silvia[bogdan.silvia@epa.gov]
From: Schwab, Kay
Sent: Wed 1/25/2017 5:38:44 PM
Subject: RE: URGENT Info on upcoming presentations public meetings, Bill Letters, etc.

Hi Brent,

I don't anticipate that any of the following will specifically apply, (unless things turn out really bad ☺), but I will let you decide.

1) I have been coordinating with EPA HQs regarding the review of the proposed reissuance of the Louisiana Short-Term and Emergency General Permit(EPA action due to LDEQ on Monday, 1/30/17). EPA HQs requested to participate in this review months ago when we were working with them in an attempt to resolve the OLD LA Withdrawal Petition. HQs/R6 could not agree on next steps for the Petition, due mostly to HQs concerns about LDEQ's use of "Emergency Declaration and Administrative Order(s)" which authorize discharges outside the scope of the CWA after events which cause the Gov. of LA to issue a (State) Emergency Declaration.

In the HQs/R6 call on Thursday, 1/19/17, EPA HQs recommended that R6 issue an Interim Objection (i.e., to request additional information) and include a discussion of EPA's concerns about the "Emergency Declaration and Administrative Order(s)," as well as, recommendations/comments to make the General Permit clearer. (The goal is to shift everything that is "covered" by the wastewater part of "Declarations" over to coverage under the General Permit ….which would be within the scope of the CWA.)

There was some discussion about having Bill Honker/Division Director sign this, but even before seeing your email today, my recommendation is that it be signed by our Acting Associate Director…the typical process for all other Interim Objections in R6. (DRAFT forthcoming later today.)

2) There is an NPDES Updates Rule call with EPA/HQs , ACWA, the states, & the Regions scheduled for Tuesday, 1/31/17. This is the 6th of a series of calls where ACWA and the states have an opportunity to clarify their public comments. EPA HQs is hopeful that the next steps will include formal response to comments & finalizing a Rule.

3) Bill met with LDEQ on 1/7-18/2017, and discussed the status of permit reissuance for LOOP (Louisiana Offshore Oil Port)..the "biggest," individual O&G in R6. This is a LDEQ/EPA R6 jointly issued permit. It has been in-house since early-2014 with the main sticking point being EPA's need for biomonitoring requirements at the "Brine Outfall" since data indicates possible toxicity. The discharge is into a segment in the Gulf which, last time I checked, the Fish and Wildlife Propagation "use" is already impaired. Since Bill will have to sign the joint permit (eventually), we have been pursuing various approaches to ensure the protection of aquatic life. 6WQ-P is to brief Bill on 2/1/17.

Let me know if you need any clarification.

Thanks

K

From: Larsen, Brent
Sent: Wednesday, January 25, 2017 10:29 AM
To: R6 6WQ-PO <R6_6WQPO@epa.gov>; R6 6WQ-PP <R6_6WQPP@epa.gov>; R6 6WQ-PT <R6_6WQPT@epa.gov>; R6 6WQ-P <R6_6WQP@epa.gov>
Subject: URGENT Info on upcoming presentations public meetings, Bill Letters, etc.
Importance: High

Sorry for short turn around, but by 2:00 pm TODAY I need a short sentence on any presentations, public meetings, Bill level letters, public actions, etc. that will occur through Friday February 3rd. David Garcia needs to provide this info to 6XA. If already on SCOUT, do not need that item. Also, looks like we will need any Bill signature type items and public meetings/presentations to go on SCOUT for now.

Takk,

Brent E. Larsen

Chief, Permitting Section (6WQ-PP)

NPDES Permits and TMDL Branch

Water Division

EPA Region 6

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