To: Chen, Isaac[Chen.Isaac@epa.gov]; Larsen, Brent[Larsen.Brent@epa.gov]; Shaikh, Taimur[Shaikh.Taimur@epa.gov]
Cc: Kaspar, Paul[kaspar.paul@epa.gov]; Rosborough, Evelyn[rosborough.evelyn@epa.gov]; Hosch, Claudia[hosch.claudia@epa.gov]; Juarez, Paul[Juarez.Paul@epa.gov]
From: Schwab, Kay
Sent: Tue 4/22/2014 10:47:41 PM
Subject: Information needed by LDEQ to finalize DRAFT/Public Notice for LOOP Port Complex, LA0049492, AI No. 4634
LA0049492 LOOP_DRAFT Mark-up of Public Notice_041414.pdf
Isaac comments on Draft Permit LA0049492.docx
2012-303d-ltr-state-final-action_Coastal Segments July 18 2013.pdf
References for Yellow Highlights from draft fact sheet and PDP.pdf

All,

(**The first 3 attachments above are the ones I sent previously with the April 14th email at bottom of chain**. The last attachment contains references for the yellow highlights below.)

I talked to Sonja Loyd, LDEQ, today to see what she needs from EPA to move forward with the JOINT LDEQ & EPA draft permit.

In addition to the yellow highlights below, she needs:

1) the Model/calculations/other information used to obtain the new TRC limits (including mo. avg and daily max. limits) , critical dilution and the dilution series for Outfall 015.

2) a "final" mark-up for the Public Notice

See link below for 40 CFR 124.10(d) – Contents for Public Notices:

http://www.ecfr.gov/cgi-bin/text-idx?SID=dd55c8987dd3d08850dfdb16f83a52e6&node=40:23.0.1.1.14.1.11.10&rgn=div8

Also may want to consider adding a link to EPA's NPDES Permit Public Notices for Louisiana website:

http://epa.gov/region6/water/npdes/publicnotices/la/ladraft.htm

Just fyi - Sonja mentioned that LOOP will likely be sending a *30-35 year old study* regarding their diffuser "not" needing WET biomonitoring?

Was biomonitoring even "invented" back then? ☺

You can reply to Sonja.Loyd@LA.GOV as appropriate and please copy me so I will know what is left to coordinate. Sonja's number is 225-219-3232.

Thanks

K

From: Schwab, Kay
Sent: Monday, April 14, 2014 5:38 PM
To: 'Sonja Loyd'
Cc: Chen, Isaac; Kaspar, Paul; 'jennifer.sheppard@LA.GOV'; Rosborough, Evelyn; Juarez, Paul
Subject: Input for LOOP Port Complex, LA0049492, AI No. 4634

Hello All,

See attachment for the main proposed revisions/sample language for "004" and "015." Also, attached is a mark-up of the Public Notice (we are still working on it & will forward more ASAP.)

We have talked about some of the following, but here's a consolidated summary. Let me know what I missed.

Thanks

K

Kay Schwab (6WQ-PO)

Environmental Engineer

US EPA Region 6

1445 Ross Ave., Ste. 1200

Dallas, TX 75202-2733

schwab.kay@epa.gov

(214) 665-6635

Fact Sheet (FS)

p.1, III. "Prepared By:" Delete Kay and add Isaac Chen, 214-665-7364, chen.isaac@epa.gov

pp. 7-8, VIII. Summary of Proposed Changes

B. "004" add biomonitoring

D. "015" revise to keep TRC @ 1/week and note more stringent limits for TRC and critical dilution/dilution series.

pp. 11-12, "004" add biomonitoring. Also, as we have discussed, there are concerns re: the oxygen scavengers/corrosion inhibitors discussion due to 303(d) impairments for DO (…and Hg, TMDL done, but still not meeting use of FWP) in Subsegment 021102. Permittee rarely, if ever, plans to use these options (with prior approval from LDEQ), so please modify as appropriate recognizing the impairments…perhaps prohibiting the use of Hg-containing substances??

p. 13, "015," keep TRC @ 1/week

pp 14-16, "TMDL Waterbodies" recommend heading change to "Impairments and TMDL Waterbodies."

Outfall 004 Need to add discussion of DO impairment for Subsegment 021102 (see attached July

18, 2013 (Final) EPA's listing letter). Also, FS states that based on evaluation of the discharges from the outfalls identified above, this facility has no potential to discharge Mercury at a level that would cause a water quality concern…." There doesn't appear to be Hg data in the application for 004? Should this be reworded?

*On p. 16, possible "typo" re: "…not meeting the TSS criteria" should be "…. Turbidity criteria." ??

*p. 17, "015," change CD to 2.6 % and revise dilution series to 1.1%, 1.5%, 2.0%, 2.6%, 3.5%.

*p.18, XII. Endangered Species: (checking on this to see if anything else is needed for EPA federal requirements)

*p.19, XIII. Ocean Discharge Criteria Evaluation: (checking on this to see if anything else is needed for EPA federal requirements)

*Appendix A/Biomonitoring Rationale. Update as for "015," CD 2.6%, dilution series to 1.1%, 1.5%, 2.0%, 2.6%, 3.5%

and add "004" biomonitoring requirements as discussed on 4/10/14.

PRELIMINARY DRAFT PERMIT (PDP)

p. 3 of 10, "004" modify footnote (*2) as appropriate re: oxygen scavengers/corrosion inhibitors/Hg (prohibition?)

p. 7 of 10, "015" modify TRC limits & keep TRC @ 1/week

Part II, p. 2 of 17, J. , modify footnote (*2) as appropriate re: oxygen scavengers/corrosion inhibitors/Hg (prohibition?)

Part II, p. 3 of 17, K., Protection of Endangered Species, "Reserved pending completion of Endangered Species Act, Section 7 consultation." ??

(L. contains Reopener Clause for Endangered Species Protection)

Part II, p.8 of 17, O. change CD 2.6 % and series to 1.1%, 1.5%, 2.0%, 2.6%, 3.5%

Also, need to add biomonitoring section for "004."