To: Juarez, Paul[Juarez.Paul@epa.gov]; Schwab, Kay[Schwab.Kay@epa.gov]
Cc: Larsen, Brent[Larsen.Brent@epa.gov]; Kaspar, Paul[kaspar.paul@epa.gov]
From: Chen, Isaac
Sent: Mon 8/25/2014 1:36:00 PM
Subject: RE: DRAFT re: LOOP 004 Biomonitoring

Paul,

Thanks.

From: Juarez, Paul
Sent: Friday, August 22, 2014 4:22 PM
To: Schwab, Kay; Chen, Isaac
Cc: Larsen, Brent; Kaspar, Paul
Subject: RE: DRAFT re: LOOP 004 Biomonitoring

Kay and Isaac-

I have reviewed the documents that LOOP has sent us regarding the 004 outfall. Does outfall 004 fall under EPA jurisdiction or LDEQ's because I thought this was a joint permit? Is this decision left to EPA or do we have to persuade the LDEQ one way or another?

Based on the fact that this these studies are VERY old, I would no longer consider them admissible or characteristic of the effluent. A lot can happen in 34 years (like my birth 3 years after the study was finalized). This is especially true when the flow of the receiving water body changes.

The LDEQ and EPA are NOT requiring a WET limit. If the effluent is as fine as it says it is, it should have no problem passing the WET test. Since 004 discharges to the Gulf of Mexico, I would recommend that marine test species be used. This way, LOOP cannot claim that x failures were due to TDS issues and not their effluent.

From what I gather from the LOOP website (http://www.loopllc.com/Services/Cavern-

Storage), It would seem that the brine is mixed in with the crude oil to displace the oil for removal and refinement. The brine and crude oil should not technically mix due its some hydrophobic properties. This could easily be disastrous if something is introduced into the cavern that would allow mixing. I don't know enough about the drilling compounds to say anything about their corrosion inhibitor products etc.

Since this outfall could be argued that it is at risk, I think requiring biomonitoring is absolutely reasonable. I am pretty sure that LOOP will argue very adamantly against this decision because no treatment is being employed and they don't want to have to build any if they find out that the brine that they are concentrating can even kill marine test species.

However, everything mentioned above may not even matter since the fact sheet indicates that the flow is 11.33 MGD. That is a lot of flow for an intermittent discharger. We could not say with a straight face that this outfall is minor. WET requirements are just the responsibility of such a huge discharge. We should reiterate that we are not establishing a WET limit. Power plants with cooling towers have to biomonitor and don't treat their effluent so I see no reason why outfall 004 should not also biomonitor.

Paul R. Juarez

ODAFF Oversight, CAFO, and WET Coordinator

NPDES Permit Oversight Section 6WQ-PO

EPA Region 6 Water Quality Division

Phone: 214-665-7247

Fax: 214-665-2191

From: Schwab, Kay
Sent: Wednesday, July 16, 2014 11:13 AM
To: Chen, Isaac
Cc: Larsen, Brent; Kaspar, Paul; Juarez, Paul
Subject: DRAFT re: LOOP 004 Biomonitoring

Isaac,

I am forwarding Taim's DRAFT responses. This has NOT been sent to LDEQ.

Not sure how y'all want to proceed with this ?? Should we discuss internally??

Thanks

K

From: Shaikh, Taimur
Sent: Tuesday, July 15, 2014 11:13 AM
To: Schwab, Kay
Subject: RE: Letter LOOP from LOOP to Sam Phillips, LDEQ re: 004 Biomonitoring

Hi Kay,

I took a shot at answering the CORMIX questions and I have attached the relevant files.

Thanks.

Taim.

Taimur A. Shaikh, Ph.D.
Water Quality Protection Division
EPA Region 6

From: Schwab, Kay
Sent: Monday, July 07, 2014 8:34 AM
To: Juarez, Paul; Shaikh, Taimur
Subject: Letter LOOP from LOOP to Sam Phillips, LDEQ re: 004 Biomonitoring

fyi

From: Doug LaBar [mailto:doug.labar@c-ka.com]
Sent: Sunday, July 06, 2014 10:08 AM
To: Jenniffer Sheppard (jenniffer.sheppard@la.gov); sonja.loyd@la.gov
Cc: Chen, Isaac; Schwab, Kay; Kaspar, Paul; Larsen, Brent
Subject: LOOP- LPDES #LA0049492/AI#4634

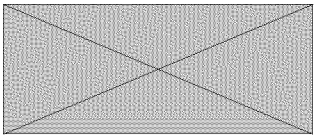
Jenniffer,

Attached is an e-copy of the letter which was submitted to Sam Phillips on 7/3/14. As you can see, we are very concerned about this. Please review and discuss with the appropriate parties and get back with us at your convenience. Thanks.

If you have any questions, please feel free to contact me.

Doug LaBar

Water Quality Program Manager



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