REGION 6 EXECUTIVE SUMMARY

TOPIC: Pending National Pollutant Discharge Elimination System (NPDES) Permit Actions in Louisiana.

DATE: January 15, 2016 CONTACT: Kay Schwab, 6WQ-PO

PURPOSE/ACTION NEEDED: For Information Only, at this time.

DEADLINE DATE: N/A

BACKGROUND: There are three ongoing permit actions that EPA R6 is coordinating with LDEQ: 1) City of Shreveport (North Regional Wastewater Treatment Plant), regarding authorization for wet weather discharges, 2) Louisiana Offshore Oil Port (LOOP), (a joint federal and state permit) regarding analytical data needed for the brine discharge, and 3) a proposed General Permit (GP) for the Louisiana Department of Transportation (LaDOT) and Development, (would be the first GP issued for a DOT in R6), there are challenges in providing clarity and meeting the minimum regulatory requirements.

CURRENT STATUS: Coordination is ongoing between EPA R6 and LDEQ permits staff.

- Shreveport – (LA0042188) Interim Objection was issued February 1, 2013.
- LOOP – (LA0049492) EPA requested effluent characterization on September 24, 2015.
- LaDOT – (LAR600000) Interim Objection was issued September 18, 2015

ENVIRONMENTAL/PUBLIC HEALTH CONCERNS: Coordination of these permit actions will ensure that the final permits include the necessary requirements to meet all of the state's water quality standards.

TECHNICAL CONCERNS:

- Shreveport – Concerns with wet weather treatment technology.
- LOOP - Challenges modeling offshore subsurface brine discharges.

LaDOT – Concerns with meeting requirements for a general permit.

REGULATORY/LEGAL REQUIREMENTS:

- Shreveport – EPA has been sued over wet weather "blending."
- LOOP – Similar facilities with brine discharges have specific permit requirements for their brine discharges so EPA must create a level "playing field."
- La DOT GP – This permit would likely be used as a "model" permit for other R6 state DOTs so EPA HQs has been involved.

COMMUNITY CONCERNS: None at this time.

RECOMMENDATIONS: Continue coordinating with LDEQ NPDES permits staff.