To: Garcia, David[Garcia.David@epa.gov]
From: Dwyer, Stacey
Sent: Mon 4/23/2018 7:43:21 PM
Subject: Fwd: LOOP update

FYI

Sent from my iPhone

Begin forwarded message:

From: "Lawrence, Rob" <Lawrence.Rob@epa.gov>
Date: April 23, 2018 at 2:30:07 PM CDT
To: "Stenger, Wren" <stenger.wren@epa.gov>
Cc: "Price, Lisa" <Price.Lisa@epa.gov>, "Donaldson, Guy" <Donaldson.Guy@epa.gov>, "Dwyer, Stacey" <Dwyer.Stacey@epa.gov>, "Robinson, Jeffrey" <Robinson.Jeffrey@epa.gov>
Subject: LOOP update

Last Wednesday, we had a productive discussion with LDEQ point-of-contacts and the 6MM, 6WQ and 6RC managers/staff working on the air and water permits for LOOP. LDEQ was not interested in asserting permitting jurisdiction into Federal waters (beyond the 3 miles of State waters). LDEQ said that they were scheduled to meet with LOOP at some point in the next 2 weeks (probably the first week of May). LDEQ agreed to float hosting a technical discussion with LOOP and EPA programs so we can move forward. We are in the process of creating an electronic version of the regulatory roadmap that was a by-product of the call.

On Thursday, ORC and I had a conference call with OFA on the scope of the document necessary for NEPA compliance with the issuance of a NPDES permit. While we are going to focus on the water discharges for existing and new discharge points, we will need to discuss other potential environmental impacts such as air emissions. It is this area that we need cooperation from the company to describe the operations (even if some of facility predates NSR requirements, but we don't know that is the case). Together with OFA assistance, the water staff is looking at the BOEM EIS for the oil/gas leasing program for environmental setting information and the LDEQ permit records for potential historical information.

The Region, on Friday, received a fairly comprehensive FOIA for LOOP (Jan 2008 to present) for water, air, NEPA, and cross-cutting statutes such as Endangered Species Act

from the Sierra Club. Steps for a HQs supported email records scan for LotusNotes and Outlook are being processed. Initial response date is May 8.

Rob Lawrence

Region 6

Policy Advisor - Energy Issues

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