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From: Dwyer, Stacey
Sent: Tue 11/28/2017 8:50:46 PM
Subject: Next Steps towards Renewal of LOOP permit
LOOP pemit modification Outfall 029 letter dated 081015.pdf

Good afternoon Ms. Matthews,

This email is to convey the next steps towards the renewal of the LOOP permit as we discussed on Monday, November 20, 2017 at 3 p.m.

1) Please provide a final letter which substantiates the discharge volumes as well as a justification for the need for a benthic study over biomonitoring for Outfall 004.

· Please reference the studies that have been conducted and ensure that both EPA and LDEQ have copies of these studies.

· It would be helpful to address the ionic imbalance issues you have encountered and how it relates to the discharge.

2) Please submit for review and comment the portions of the Environmental Management Program plan (or a standalone document, such as a work plan) which describe the brine diffuser benthic monitoring for use in determining impacts due to the discharge for Outfall 004.

· The plan must detail the frequency of sampling, sampling locations, species identification, and lab methods to be used.

EPA plans on using this information to work with LDEQ in the preparation of a permit for issuance by the end of this calendar year. We envision that the permit will include language that will require a benthic study and an ionic imbalance study. The benthic monitoring study would be for a period of three years, in which a final report would be submitted at the end of year 4. The ionic imbalance study would be based on one biomonitoring sample, which would be taken to assess ionic imbalance using the CORMIX calculated critical dilution. The permit will require the establishment of an EPA/LDEQ approved benthic monitoring plan and ionic imbalance study plan within six months of permit issuance.

As stated during our conference call, if you submit the Environmental Management Program plan (or a standalone document, such as a work plan) which describe the brine diffuser benthic monitoring, within the next 2 weeks, EPA/LDEQ can comment on the plan so that you would have a document approved within 6 months of the effective date of the permit.

Lastly, please confirm that the number of outfalls that are to be covered in this joint LDEQ/EPA permit are reflected in the diagram per your August 10, 2015 letter (letter attached).

I thank you for your suggestions and comments. If you have any further questions, please email me and we are willing to set up a conference call.

Thank you,

Stacey B. Dwyer, P.E.

Associate Director

NPDES Permits & TMDLs Branch

U.S. EPA Region 6