To: Kaspar, Paul[kaspar.paul@epa.gov]
Cc: Scott Guilliams[Scott.Guilliams@LA.GOV]; Schwab, Kay[Schwab.Kay@epa.gov]; Michelle Bickham[Michelle.Bickham@LA.GOV]; sonja.loyd@la.gov[sonja.loyd@la.gov]; Bruce Fielding[Bruce.Fielding@LA.GOV]
From: Jenniffer L. Sheppard
Sent: Mon 8/17/2015 8:43:02 PM
Subject: FW: LOOP- Outfall 004

Paul,

It appears LOOP has some concerns regarding submittal of the requested lab data. Please see the e-mail below.

Jenniffer Sheppard

Louisiana Department of Environmental Quality

General and Industrial Water Permits Manager

P.O. Box 4313

Baton Rouge, LA 70821-4313

Phone: (225) 219-3197

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From: Doug LaBar [mailto:doug.labar@c-ka.com]
Sent: Monday, August 17, 2015 3:08 PM
To: Jenniffer L. Sheppard; Sonja Loyd
Cc: Cindy Leblanc
Subject: LOOP- Outfall 004

Hello Jenniffer and Sonja,

We can collect and submit effluent characterization data for Outfall 004 (brine) for Table II (metals), Table III (volatiles, acids, and BNAs), and Table IV (conventional and non-

conventional) as requested. Pesticides and PCBs will not be collected per the request. Table IV includes radioactivity. Please advise if this is required because in the past we have not included this for other oil and gas operations.

However, we do not believe that Table V is appropriate. The State Water Quality Regulations at LAC 33:IX. 2501 only require an applicant to indicate whether it knows or has reason to believe that any of these pollutants are discharged from the outfall. For every pollutant expected to be discharged, the applicant must report any data it has for any pollutant. We evaluated each pollutant and have no reason to believe that any of them are present in the brine discharge. Therefore, we believe it is appropriate to only indicate that we do not know or have reason to believe that any of these pollutants are discharged.

There are 80 pollutants listed on Table V and most are pollutants that are not typically analyzed by a commercial lab. The cost for a specialty or research lab to analyze for all these pollutants will be significant. AccuTest can only analyze for 10 of the pollutants (uranium, zirconium, strontium, vanadium, aniline, carbon disulfide, cresol, styrene, vinyl acetate, and xylene). We believe that the pollutants in Tables II, III, and IV are sufficient to evaluate potential toxicity.

Also, it is confusing that pesticides and PCBs are not requested, but many of the pollutants on Table V are herbicides and pesticides.

Please advise. Thanks.

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

Doug LaBar

Water Quality Team Leader

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