To: Larsen, Brent[Larsen.Brent@epa.gov]
Cc: Schwab, Kay[Schwab.Kay@epa.gov]
From: Restivo, Angela
Sent: Wed 6/7/2017 2:36:30 PM
Subject: FW: ACTION Items Due on 6/6/17 for the week of 6/12-16, 2017

Brent, It looks like you were inadvertently left off of the email below.

From: Schwab, Kay
Sent: Tuesday, June 06, 2017 5:28 PM
To: Restivo, Angela <Restivo.Angela@epa.gov>
Cc: Chen, Isaac <Chen.Isaac@epa.gov>; Bogdan, Silvia <bogdan.silvia@epa.gov>; Burrell, Monica <Burrell.Monica@epa.gov>
Subject: FW: ACTION Items Due on 6/6/17 for the week of 6/12-16, 2017

Hi Brent,

Continuing items, updates and new info below. (Monica is reviewing **Solvay** & she may be sending you other/additional info.)

Thanks

K

Isaac/Silvia, Please see LOOP updates. OK?

Monica, see "suggested" updates on **Solvay** due to receipt of ESO. I have not had a chance to discuss with Angela (*she has been very busy!)*☺

Upcoming Meeting/Program Review

- **Type of Event:** Preliminary discussions with Louisiana Department of Environmental Quality (LDEQ) to set up the FY17 National Pollutant Discharge Elimination System (NPDES) Program - Permit Quality Review (PQR) – (EPA R6 FY17 commitment)
- **Date/Place of the Event:** Need to contact and coordinate with LDEQ **ASAP**

regarding the proposed review dates. (EPA has significant preparation work prior to this review.) We will propose that the PQR occur in approximately October 2017 @ LDEQ offices.

- **Description of the event/subject matter:** PQRs assess whether a state adequately implements the requirements of the NPDES program as reflected in the permit and other supporting documents. PQRs are intended to promote national consistency, identify successes in implementing the NPDES program, and establishes opportunities for improvement in developing NPDES permits and can be helpful in identifying areas for training or guidance.
- **EPA Participants involved in the event:** R6WQ-PO staff, and possibly EPA HQs OWM-WPD staff/contractor support
- **Approximate Number of people in attendance:** R6WQ-PO (1 or 2) and EPA HQs/contractor (1 or 2)

Louisiana Offshore Oil Port (LOOP), LLC, Deepwater Port Complex, (joint venture of Marathon Pipe Line LLC, Valero Terminal and Distribution Company, and Shell Oil Company) (LPDES Permit No. LA0049492, AI No. 4634) - State Permit Review and EPA Permit Issuance AND Call with LDEQ

The existing wastewater permit which was jointly issued by EPA & LDEQ expired September 30, 2013. EPA and LDEQ are continuing to work together on the proposed reissuance of the permit regarding appropriate permit requirements for brine discharges. This situation is similar to the Strategic Petroleum Reserves (SPR) under the U.S. Department of Energy, (Big Hill Oil Storage, TX0092827, and Bryan Mound Oil Storage, TX0074012).EPA reissued these permits in November 2014. In an EPA and LDEQ conference call on May 25, 2017, LDEQ requested that EPA provide whole effluent toxicity (WET) lab information from similar SPR facilities per LOOP's request. EPA provided this information to LDEQ on May 31, 2017. After LDEQ/LOOP review, EPA will be available to have further discussions and can provide additional technical assistance. A call between EPA, LDEQ and possibly LOOP, as well, is anticipated later in June 2017. It is EPA's understanding that LOOP is now considering acceptance of WET biomonitoring requirements in the permit rather than a possible alternate approach regarding authorization for the brine discharge. The joint LDEQ/EPA permit will be reissued ASAP. The Water Division Director was briefed on June 1, 2017, and additional R6 upper management briefings are planned later in June 2017.

~~**Denka Performance Elastomer LLC, Pontchartrain Plant (LaPlace, LA) (LPDES Permit No. LA0127190, AI No.193310) - State Permit Review**~~

~~Denka is a new owner of a portion of this existing synthetic rubber manufacturer with neoprene and chloroprene manufacturing units. (DuPont retained a portion of the facility under its existing permit, LA0005924, AI No. 38806). EPA and LDEQ have ongoing air-~~

~~related efforts at this facility. LDEQ provided clarifications for some of EPA's concerns via a conference call on May 25, 2017, and LDEQ agreed to an extension of the May 31, 2017, the regulatory deadline, through June 8, 2017. EPA plans to issue a response letter, as soon as possible, but no later than June 8, 2017.~~ *Letter was signed by Rich for Stacey on 6/6/17. We plan to call LDEQ 6/7/17 a.m. as a heads-up, then will issue letter.*

Solvay USA Inc. Solvay Baton Rouge Site - Aroma Performance Facility, (LPDES Permit No. LA0005223, AI No. 193924) - State Permit Review

This site is an existing organic chemical manufacturing facility (previously known as Rhodia Inc.). Portions of this facility and the existing permit have been transferred from Solvay to Eco Services Operations Corp. (ESO), the new owner and operator of a portion of the existing facility. Upon further review of the proposed reissuance permit with changes, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible. The regulatory deadline for Solvay is set for June 14, 2017; however, on June 2, 2017, EPA R6 received the preliminary draft permit for ESO. EPA R6 may contact LDEQ to discuss the possibility of an extension for the Solvay review to better understand the split of the existing facility between Solvay and ESO. *See ESO below*

Union Carbide Corporation, St. Charles Operations Site, (LPDES Permit No. LA0000191, AI No. 2083) - State Permit Review

This operation manufactures organic chemicals and plastic materials, synthetic resins, and nonvulcanizable elastomers with a continuous discharge of 584 MGD. Upon further review of the proposed reissuance permit with changes, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible, but no later than June 19, 2017, the regulatory deadline.

ExxonMobil Refining and Supply Company, Baton Rouge Refinery, (LPDES Permit No. LA0005584, AI No. 2638) - State Permit Review

This existing integrated petroleum refinery processes over 543,000 barrels of crude oil per day. Upon further review of the proposed reissuance permit with changes, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible, but no later than June 21, 2017, the regulatory deadline.

(I left out some others here, but they will appear in next week's edition…)

Eco Services Operations Corp.-DE, Eco Services Operations Baton Rouge Plant (ESO), (LPDES Permit No. LA0127172, AI No. 1314) - State Permit Review

This facility was previously owned and operated by Solvay USA Inc. Solvay divested its sulfuric acid production operations and docking facility. Upon further review of this first time proposed permit issuance, EPA will determine the appropriate response for issuance to LDEQ, as soon as possible but no later than July 3, 2017, the regulatory deadline. *See Solvay above*