To: Schwab, Kay[Schwab.Kay@epa.gov]
From: Clark, Jackie
Sent: Mon 9/25/2017 2:10:14 PM
Subject: RE: LDEQ UPDATES to FY18 Priority Permit LA Candidate List

Hi Kay,

I'll update my list. Terminations do count toward the priority permit commitment, so we can leave that one on there.

Thanks,

Jackie

Jacqueline M. Carroll Clark
U.S. Environmental Protection Agency
Office of Wastewater Management
Water Permits Division
202-564-6582
clark.jackie@epa.gov

From: Schwab, Kay
Sent: Monday, September 25, 2017 10:08 AM
To: Clark, Jackie <Clark.Jackie@epa.gov>
Subject: FW: LDEQ UPDATES to FY18 Priority Permit LA Candidate List

Hi Jackie,

I received the following from LDEQ on Friday!

See my red notes below.

Thanks (again…)

K

From: Jenniffer L. Sheppard [mailto:Jenniffer.Sheppard@LA.GOV]
Sent: Friday, September 22, 2017 3:27 PM
To: Schwab, Kay <Schwab.Kay@epa.gov>
Subject: RE: Updated FY18 Priority Permit LA Candidate List

FYI

The TESI permit below has been fixed in ICIS, so it should come off the report.

~Jenniffer Sheppard

From: Jenniffer L. Sheppard
Sent: Friday, September 22, 2017 9:27 AM
To: 'Schwab, Kay'; Kimberly Corts; Bruce Fielding; Christy Clark
Cc: Hayes, Mark; Shahriyar, Syed; Dwyer, Stacey
Subject: RE: Updated FY18 Priority Permit LA Candidate List

UPDATE

We have issued the following permits already, so they can come off the list:

LA0000906 Valentine Chemicals Issued 9/8/17

LA0003816 Magellan Terminals Holdings Issued 8/18/17

LA0005223 Solvay USA Inc Issued 8/25/17 My 9/20/17 email included this issuance.

LA0007374 Entergy Operations Waterford 2 Issued 8/29/17

LA0075833 International Matex Tank Term Issued 8/30/17

LA0081981 TESI Issued 9/22/15 The existing permit was only recently entered into ICIS. (Issued 9/22/15, eff 11/1/15, exp 10/30/20)

LA0115487 St Mary Parish Water&Sewer Issued 9/8/17

LAS000101 Baton Rouge/EBR Parish Issued 9/8/17 My 9/20/17 email included this issuance.

Also, we just received a termination request for LA0053708, Air Liquide. I won't be complete before 9/30/17. Not sure how terminations work on the priority list. **Jackie, can this termination in FY18 be counted towards the FY18 commitment??**

~Jenniffer Sheppard

From: Schwab, Kay [mailto:Schwab.Kay@epa.gov]
Sent: Wednesday, September 20, 2017 3:27 PM
To: Jenniffer L. Sheppard; Kimberly Corts; Bruce Fielding
Cc: Hayes, Mark; Shahriyar, Syed; Dwyer, Stacey
Subject: Updated FY18 Priority Permit LA Candidate List

Hi LDEQ,

I am pleased to let you know that EPA HQs agreed to remove all six "6" of the permits which LDEQ identified (see below).

Also, it is noted that LA0005223, Solvay (a FY17 "commitment"), and LAS000101, Baton Rouge MS4 have been issued and will "fall off" the FY18 candidate list.

Thus, the preliminary list of "30" sent to you on 8/4/17, now becomes "22." (See the 9/20/17 PMOS mark-up attachment.) ….of course this list may become shorter if LDEQ issues any of listed permits on or before Sept. 30, 2017.

You can now begin refining your commitments for FY18 Priority Permits. Please send me this information after your Sept. 30, 2017 issuance are known, but **no later than Wednesday, Oct.**

4, 2017.

The following link contains information on the priority permit selection and commitment process: https://www.epa.gov/npdes/npdes-program-management-and-oversight#pqr (i.e., still 20%, then 80%).

It appears that the FY 18 commitment will need to be four (4) (…round down especially if a few more permits get issued in FY17 ☺.) LDEQ may want to consider "selecting" five (5) candidates so that there is some built-in leeway for the commitment without be required to request a "swap" from EPA HQs. Also, please submit the "reason" for each "selection" (described in the above link).

Let me know if you have any additional questions or concerns,

Thanks

K

From: Jenniffer L. Sheppard [mailto:Jenniffer.Sheppard@LA.GOV]
Sent: Monday, August 21, 2017 3:32 PM
To: Schwab, Kay <Schwab.Kay@epa.gov>; Kimberly Corts <Kimberly.Corts@LA.GOV>; Bruce Fielding <Bruce.Fielding@LA.GOV>; Scott Guilliams <Scott.Guilliams@LA.GOV>
Cc: Hayes, Mark <hayes.mark@epa.gov>; Shahriyar, Syed <Shahriyar.Syed@epa.gov>
Subject: RE: Draft FY18 Priority Permit Candidate List - for Louisiana

Kay,

There are several scheduled for issuance by September 30th that should come off the list unless

something unexpected comes up, so I'm not sure what number we'll need for our initial FY18 selections just yet. We do have the following 3 draft permits in routing right now (not scheduled for issuance this current year) that could be possible candidates for next year.

LA0003735	Reynolds Metals Company- Lake Charles Carbon Company
LA0075833	INTERNATIONAL MATEX TANK TERMINALS LLC
LA0007501	Arclin U.S.A., LLC.- Dodson Facility

In regards to consideration for removal, LDEQ has identified the following 6 permits:

LA0041394	City of Shreveport- Lucas WWTP	Proposed removal due to blending issues – federal litigation
LA0042188	City of Shreveport- North Regional WWTP	Proposed removal due to blending issues – federal litigation
LA0049492	LOOP LLC- Deepwater Port Complex	Proposed removal – ongoing negotiations with WET implementation
LA0111091	HARRELSON MATERIALS MANAGEMENT INC.	Proposed removal – facility is in post closure
LA0124800	TIDEWATER LANDFILL LLC	Proposed removal – permit complexities associated with post closure
LA0032328	City of Hammond- South Slough Wetland Wastewater Assimilation Project	Proposed removal - permit complexities associated with wetland assimilation

Also, your assessment on expired permits is accurate, as most of them are administratively continued. This is an area that LDEQ needs look at further. It will require some internal discussion with our Permit Compliance Unit (PCU) to come up with a better way to update the system.

Please let me know if you need anything else.

~Jenniffer Sheppard

From: Schwab, Kay [mailto:Schwab.Kay@epa.gov]
Sent: Monday, August 21, 2017 11:42 AM
To: Kimberly Corts; Jenniffer L. Sheppard; Bruce Fielding
Cc: Hayes, Mark; Shahriyar, Syed
Subject: RE: Draft FY18 Priority Permit Candidate List - for Louisiana

Hi Kim,

Thanks for the info. EPA HQs should "automatically" remove any that are on the FY18 candidate list that are issued on or before Sept 30, 2017.

Does LDEQ have any other comments/proposed removal of any of the FY18 candidates?

We will be compiling the R6 reply to HQs tomorrow, August 22, 2017.

Thanks

K

From: Kimberly Corts [mailto:Kimberly.Corts@LA.GOV]
Sent: Friday, August 04, 2017 1:15 PM
To: Schwab, Kay <Schwab.Kay@epa.gov>; Jenniffer L. Sheppard <Jenniffer.Sheppard@LA.GOV>; Bruce Fielding <Bruce.Fielding@LA.GOV>
Cc: Hayes, Mark <hayes.mark@epa.gov>; Dwyer, Stacey <Dwyer.Stacey@epa.gov>; Shahriyar, Syed <Shahriyar.Syed@epa.gov>
Subject: RE: Draft FY18 Priority Permit Candidate List - for Louisiana

A few of these should be issued this fiscal year – LAS000101, LA0040185, and LA0038288.

From: Schwab, Kay [mailto:Schwab.Kay@epa.gov]
Sent: Friday, August 04, 2017 1:08 PM
To: Jenniffer L. Sheppard; Kimberly Corts; Bruce Fielding
Cc: Hayes, Mark; Dwyer, Stacey; Shahriyar, Syed
Subject: Draft FY18 Priority Permit Candidate List - for Louisiana

Hi All,

I have attached the draft FY18 Priority Permit Candidate list for LA – "first round." (This is **just** the initial prep work requested by EPA HQs. You do **not** have to formalize selections at this time.)

Please let us know by **August 18th**, if you see any errors or have any requests for candidate removals for permits with unique circumstances preventing their reissuance or termination during the fiscal year. FY18 runs from Oct. 1, 2017 through September 30, 2018. Please provide a brief discussion of any errors you find and/or the reason for removal of a candidate.

It is noted that 23 of the 30 "draft" candidates are shown as "Expired." I seem to recall from last year that it is likely that some of these are actually "Administratively Continued." I believe that the issue identified was that the group (in another Division) that enters info into ICIS, typically updates info in ICIS *after* a permit issued. Thus, ICIS may be defaulting to "Expired" on some of these because the new "application received date" has not been entered into ICIS yet??

The next step will be for EPA HQs to load the revised candidate list into PMOS and we will forward you this information in a few weeks to begin the "formal" selection and commitment process.)

Like previous years, we will be looking for a selection of 20% of the candidates and a commitment of 80% of the selected permits.

If you would like, you may also begin making priority permit selections by highlighting permits in the attached file and adding a reason for selection for each from the list below:

a. National program priority (CAFO)

b. Significant changes to facility's operations

c. National program priority (CSO)

d. Discharge to drinking water resources

e. Revised effluent limitations guidelines

f. Protection of an endangered species

g. Environmental justice

h. Facility located on priority watershed

i. Permit is more than 10 years expired

k. Discharge to an impaired water body (i.e., water body on 303(d) list)

l. Implementation of a WLA from a TMDL

m. Revised water quality standards

o. Other. If "Other" is selected, an explanation/description must also be provided.

Thanks in advance for your input,

K

Kay Schwab (6WQ-PO)

Environmental Engineer

US EPA Region 6

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