To: Sonja Loyd[sonja.loyd@la.gov]
Cc: Chen, Isaac[Chen.Isaac@epa.gov]; Kaspar, Paul[kaspar.paul@epa.gov]; jennifer.sheppard@LA.GOV[jennifer.sheppard@LA.GOV]; Rosborough, Evelyn[rosborough.evelyn@epa.gov]; Juarez, Paul[Juarez.Paul@epa.gov]
From: Schwab, Kay
Sent: Mon 4/14/2014 10:38:17 PM
Subject: Input for LOOP Port Complex, LA0049492, AI No. 4634
LA0049492 LOOP_DRAFT Mark-up of Public Notice_041414.pdf
Isaac comments on Draft Permit LA0049492.docx
2012-303d-ltr-state-final-action_Coastal Segments July 18 2013.pdf

Hello All,

See attachment for the main proposed revisions/sample language for "004" and "015." Also, attached is a mark-up of the Public Notice (we are still working on it & will forward more ASAP.)

We have talked about some of the following, but here's a consolidated summary. Let me know what I missed.

Thanks

K

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Fact Sheet (FS)

p.1, III. "Prepared By:" Delete Kay and add Isaac Chen, 214-665-7364, chen.isaac@epa.gov

pp. 7-8, VIII. Summary of Proposed Changes

B. "004" add biomonitoring

D. "015" revise to keep TRC @ 1/week and note more stringent limits for TRC and critical dilution/dilution series.

pp. 11-12, "004" add biomonitoring. Also, as we have discussed, there are concerns re: the oxygen scavengers/corrosion inhibitors discussion due to 303(d) impairments for DO (…and Hg, TMDL done, but still not meeting use of FWP) in Subsegment 021102. Permittee rarely, if ever, plans to use these options (with prior approval from LDEQ), so please modify as appropriate recognizing the impairments…perhaps prohibiting the use of Hg-containing substances??

p. 13, "015," keep TRC @ 1/week

pp 14-16, "TMDL Waterbodies" recommend heading change to "Impairments and TMDL Waterbodies."

Outfall 004 Need to add discussion of DO impairment for Subsegment 021102 (see attached July 18, 2013 (Final) EPA's listing letter). Also, FS states that based on evaluation of the discharges from the outfalls identified above, this facility has no potential to discharge Mercury at a level that would cause a water quality concern…." There doesn't appear to be Hg data in the application for 004? Should this be reworded?

*On p. 16, possible "typo" re: "…not meeting the TSS criteria" should be "…. Turbidity criteria." ??

*p. 17, "015," change CD to 2.6 % and revise dilution series to 1.1%, 1.5%, 2.0%, 2.6%, 3.5%.

*p.18, XII. Endangered Species: (checking on this to see if anything else is needed for EPA federal requirements)

*p.19, XIII. Ocean Discharge Criteria Evaluation: (checking on this to see if anything else is needed for EPA federal requirements)

*Appendix A/Biomonitoring Rationale. Update as for "015," CD 2.6%, dilution series to 1.1%, 1.5%, 2.0%, 2.6%, 3.5%

and add “004” biomonitoring requirements as discussed on 4/10/14.

PRELIMINARY DRAFT PERMIT (PDP)

p. 3 of 10, “004” modify footnote (*2) as appropriate re: oxygen scavengers/corrosion inhibitors/Hg (prohibition?)

p. 7 of 10, “015” modify TRC limits & keep TRC @ 1/week

Part II, p. 2 of 17, J. , modify footnote (*2) as appropriate re: oxygen scavengers/corrosion inhibitors/Hg (prohibition?)

Part II, p. 3 of 17, K., Protection of Endangered Species, “Reserved pending completion of Endangered Species Act, Section 7 consultation.” ??

(L. contains Reopener Clause for Endangered Species Protection)

Part II, p.8 of 17, O. change CD 2.6 % and series to 1.1%, 1.5%, 2.0%, 2.6%, 3.5%

Also, need to add biomonitoring section for “004.”